Unabomber

Turchie affidavit

Following is the text of an affidavit sumbitted April, 3, 1996, by FBI agent Terry D. Turchie in support of the government's request for a search warrant for Theodore Kaczynski's Montana cabin.

AFFIDAVIT OF ASSISTANT SPECIAL AGENT IN CHARGE

TERRY D. TURCHIE

U.S. DISTRICT OF MONTANA

1. I, Terry D. Turchie, having been duly sworn, depose and state that I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since 1976. I graduated from California State University at Sacramento in 1972 with a BA Degree in Criminal Justice and Southern Illinois University in 1976 with an MS Degree in Political Science. From 1976 to 1988, I was assigned to investigate a variety of federal criminal matters in both the FBI's Portland and New York's offices. In 1988, I was assigned to the San Francisco Division of the FBI as a Supervisory Special Agent (SSA) of a Foreign Counterintelligence Squad, where I supervised a number of sensitive Foreign Counterintelligence investigations. In 1994, I was re-assigned as the SSA for the UNABOM Task Force (UTF) in San Francisco. My responsibilities included the coordination of the efforts of the three agencies represented on the UTF (FBI, Bureau of Alcohol, Tobacco, and Firearms, and Postal Inspection Service); the development of an integrated investigative strategy to ensure the complete investigation of all UNABOM events and the identification of potential suspects; and the supervision of agent and support personnel assigned to the UNABOM Squad.

2. In 1995, I was designated the Assistant Special Agent in Charge (ASAC) of San Francisco's National Foreign Intelligence Program, to include continued management oversight of the UNABOM investigation. As a result of a growing investigative effort, I was designated as the ASAC in charge of the UNABOM Division of the San Francisco office

in July, 1995 In that position, I coordinate all investigative efforts of the UNABOM investigation throughout the United States.

3. This affidavit also relies upon the examinations and conclusions of Thomas J. Mohnal who is presently a Supervisory Special Agent (SSA) Examiner in the Explosives Unit of the FBI Laboratory, Washington, D.C. SSA Mohnal graduated in 1979 from Lycoming College in Williamsport, Pennsylvania with a BA degree in criminal justice. In 1982, SSA Mohnal was employed as a Physical Science Technician in the FBI Laboratory. In that year he successfully completed the FBI's "Bombing Crime Scene School" at the FBI Academy, Quantico, Virginia. He also graduated from the Basic Demolition and Improvised Explosive Device School at the United States Naval Explosive Ordinance Disposal Technology Center at Indian Head, Maryland. In 1985 he was appointed as a Special Agent of the FBI and received the basic training of a Special Agent. SSA Mohnal was then assigned as an investigative agent to the Las Vegas Division of the FBI until 1989, at which time he was returned to the Explosives Unit at the FBI Lab. In 1989, he received additional training by senior laboratory examiners within the FBI Lab. He received instruction in the procedures and equipment utilized within the Explosives Unit regarding laboratory examinations. In addition, he became familiar with the reference literature dealing with explosives, blasting accessories and explosive devices.

4. In 1990, SSA Mohnal graduated from the United States Army's Hazardous Devices School in Huntsville, Alabama. The school is the center of all training for "render safe" techniques to law enforcement civilians. The school also provided detailed instruction with regard to other areas of explosive matters, including recognition of commercial and military explosives, improvised explosive devices, bomb components and fusing systems. Since 1989, SSA Mohnal has conducted thousands of examinations of items of evidence from actual bombings and has conducted or assisted in numerous domestic and international bomb scene investigations. SSA Mohnal continually attends seminars and formal training programs on explosives and pyrotechnics and visits explosive manufacturing facilities to observe commercial and military explosive production and packaging operations. He has lectured on crime scene investigations and explosive technology at the FBI Academy and at other law enforcement academies and bomb technician schools throughout the country. He has testified in court and has been qualified as an expert witness in the field of explosives and explosive devices.

5. The facts set forth in this affidavit are based upon the personal observation and investigation of the Affiant, or upon the official reports of other members of the Unabom Task

Force or of the law enforcement community. These reports include the following: Reports of Interviews, Laboratory Reports, (including laboratory analysis, diagrams, and charts), Expert Reports, Witness Statements, Police Incident Reports, and Crime Scene Photographs.

6. This affidavit is submitted in support of a search warrant to obtain evidence for violations of the following statutes:

Title 18, United States Code, Section 842 (Illegal Manufacture of an Explosive Device).

Title 18, United States Code, Section 875 (Extortionate Interstate Communications).

Title 18, United States Code, Section 876 (Mailing Threatening Communications).

Title 18, United States Code, Section 844(d) (Possession and receipt of explosives in interstate commerce with intent to kill, injure, or intimidate).

Title 18, United States Code, Section 844(i) (Damage or destruction of property in interstate commerce).

Title 18, United States Code, Section 924(c) (Use of a destructive device during a crime of violence).

Title 18, United States Code, Section 1716 (Mailing injurious articles).

Title 26, United States Code, Section 5861 (Receipt, possession, manufacture, or transportation of unregistered destructive device).

7. This affidavit is submitted in support of a search warrant for the premises belonging to, owned by, and/or under the control of, Theodore John Kaczynski, described as a one room cabin and the curtilage including a root cellar, located one quarter mile east of Stemple Pass Road, approximately four files southeast of Lincoln, Montana, and further described in Attachment A to this affidavit and hereby incorporated by reference.

I

INTRODUCTION

8. The investigation in this case concerns a series of bombings which have occurred throughout the United States beginning with a bombing on May 25, 1978 and continuing until the last known bombing on April 24, 1995. In each of these bombings an improvised explosive, and/or incendiary device (referred to throughout this affidavit as an explosive device) was used. During the course of this investigation, members of

the UNABOM Task Force, as well as experts in the field of bomb construction and forensics, have identified significant similarities in all these bombings, and have concluded that all of these bombings have been carried out by the same individual or group of individuals acting in concert. Similarities have been noted in the construction of the explosive devices, in the methods of delivering the destruction devices to the victims, in the locations of the incidents, and in personal identification marks placed inside several of the explosive devices.

9. As to the construction of the destructive devices, each was passive (i.e. requiring some initiating action by the victim), the main explosive charges were similar (i.e. smokeless powder, potassium chlorate, ammonium nitrate, sodium chlorate, and aluminum powder/flakes), the fusing systems were similar (i.e. power sources, wiring arrangements, switches, and initiator), and the housing for the explosive devices were constructed of similar materials (i.e. wooden, cardboard, or plastic boxes).

10. The explosive devices were delivered to the victim either by physical placement or by the United States Postal Service. The devices which were placed were put in areas of open access with efforts meant to attract and deceive a potential victim. The mailed devices had similar packaging and similar efforts to falsely identify a return addressee, usually listing a fictitious person or address.

11. The locations of the incidents are similar in that the devices were mailed to or from, or placed in Chicago, Salt Lake City, Sacramento, or the San Francisco Metropolitan Bay Area. Devices that exploded in Connecticut, New Jersey and Tennessee were mailed from Sacramento, San Francisco and Provo, Utah, respectively. A device that was recovered in Washington had been mailed from Oakland, California.

12. Eight (8) of the 16 devices bore a personal identification mark consisting of the initials "FC" located either inside the devices or contained in letters sent to the New York Times newspaper, which accompanied the making of devices.

13. In a letter received by the New York Times on April 24, 1995, the writer (who based on his use of a password and forensic analysis we believed to have authored other UNABOM documents) claimed credit for several devices, including the bomb that killed Thomas Mosser on December 10, 1994, and individuals at universities who have been "specialists in technical fields."

II

CHRONOLOGY OF EVENTS

14. The following is a chronological description of the sixteen

bombing incidents which include an outline of the events prior to and following the discovery of each of the explosive devices, a physical description of each explosive device, and a list of the components of each device recovered from the blast scenes.

A.

May 26, 1978 - Chicago, Illinois
(Explosive Device #1)

15. This device was contained in a parcel wrapped in brown paper and was discovered unattended in the University of Illinois, Chicago Campus, Engineering Building parking lot. The parcel was addressed to Professor E.J. Smith at Rensselaer Polytechnic Institute (RPI), Troy, New York, with a return address of Professor Buckley Crist at Northwestern University (NWU), Evanston, Illinois. The woman who discovered the parcel contacted Northwestern University and made arrangements to have the parcel returned to Crist. Upon receiving the parcel, Crist became suspicious, since he had not mailed any such parcel. He then contacted the NWU, Department of Public Safety. When the parcel was opened by a NWU Public Safety officer, it exploded causing only minor injuries. The officer's injuries were minor because the majority of the blast was directed to the side away from the officer. However, an analysis of the components of the explosive device by the Bureau of Alcohol Tobacco and Firearms (ATF) Laboratory concluded that this device was capable of causing serious injury or death to persons in close proximity to the explosion. Professor E.J. Smith, the intended recipient of the parcel, was located and interviewed by ATF agents. He stated, as did Professor Crist, that he had no knowledge of the parcel and no information concerning who might have constructed the bomb.

16. An analysis of the components of the explosive device by the ATF Laboratory revealed that it was constructed of a one inch diameter galvanized pipe approximately nine inches in length sealed on one end with a wooden plug. The explosive charge consisted of two types of smokeless powders and match heads. The pipe containing the main charge, together with an improvised mechanical firing mechanism consisting of a nail held under tension by multiple rubber bands, was encased in a homemade wooden box. The cover of the box was designed to release tension on the firing pin causing the nail to strike the match heads, thus igniting the smokeless powder.

17. The following components were recovered from the blast scene:

- Remnants of 1" pipe
- Wooden box

- Screws
- Nails
- Rubber bands
- Epoxy
- Two types of smokeless powder
- Match heads
- wood plug
- 3/4" black plastic tape
- 1/2" filament tape
- Brown wrapping paper
- "Eugene O'Neill" $1 U.S. postage stamps - Mailing label

B.

May 9, 1979 - Evanston, Illinois
(Explosive Device #2).

18. This device, contained in a "Phillies" brand cigar box, was discovered on a table in room 2424 of the Technical Building of Northwestern University, Evanston, Illinois. At the time of the explosion, Room 2424 was described as an area which was utilized primarily by graduate students, faculty, and visiting scholars, and was normally occupied by two teaching assistants. The device was observed by students on the morning of May 9, 1979, but it was not until mid-afternoon that John Harris, a member of the Civil Engineering Department, opened the box. Upon opening the box, the device exploded inflicting numerous lacerations and burns to Harris.

19. An analysis of the components of the explosive device by the ATF laboratory revealed that the main charge explosives consisted of match heads and a fusing system, consisting of two independent circuits each of which could detonate the device. Each circuit consisted of two C-cell batteries wired to two improvised wooden dowel initiators. Each initiator contained a pair of wires routed through a wooden dowel. The wires were joined at their termination point by a thin bridge wire. The termination point was inside the explosive main charge. When the box was opened, the electrical circuit was completed, and the thin bridge wire was heated, thereby igniting the mixture of smokeless powder and match heads. The above materials were contained in a "Phillies" brand cigar box which incorporated an anti-open switch designed to trigger the device upon opening the box lid.

20. The following components were recovered from the blast scene:

- "Phillies" Cigar box
- Anti-open switch (wire loop switch)
- Smokeless powders
- Match heads
- Paper pouch (contained powder and match heads)

- C-cell batteries
- White insulated duplex stranded wire
- Solder
- Wood fragments
- Wooden dowels (part of initiator assemblies)
- Maple wood sticks
- Epoxy
- White glue
- Monofilament fishing line
- 3/4" white filament tape
- 3/4" black plastic tape
- 3/4" black friction tape
- 1/2" filament tape
- Brown paper
- Tape tabs

C.

November 15. 1979 - Chicago, Illinois
(Explosive Device #3)

21. This device was contained in a parcel which was mailed from the North Suburban postal facility which is located in the in Chicago; Illinois area, on November 14, 1979. Investigators have not been able to determine the intended addressee of parcel, or the return address, as a result of the damage sustained by the parcel following detonation. However, because the parcel was routed by U.S. Postal employees to Washington, D.C., aboard an American Airlines Boeing 727 the address was believed to have been the Northeastern United States. Shortly after takeoff, after the aircraft had reached the approximate altitude of 34,500 feet, the flight crew experienced problems with the aircraft which they described as a thump. Smoke subsequently filled the cabin and the aircraft was forced to make an emergency landing. It was later determined that the device had exploded in a mail container located in the baggage compartment. Approximately eighteen of the passengers were treated at the scene for smoke inhalation. The baggage compartment of the aircraft and the items inside were damaged by fire.

22. An analysis of the components of the explosive device by the FBI Laboratory revealed that it was constructed from a large juice can which housed an explosive main charge comprised of smokeless powder and a variety of chemicals commonly utilized in the manufacture of pyrotechnics, such as fireworks. The fuzing system consisted of four C-cell batteries wired to a modified barometer switch and a loop switch to two improvised wooden dowel initiators. The device was contained in a homemade wooden box with a lid hinged at the rear. The barometer switch was designed to initiate the device as the aircraft gained altitude. The device also contained a second fuzing system which was an anti-open switch which would activate the device upon opening its

lid.

23. The following components were recovered from the blast scene:

- Wooden box
- Anti-open switch (wire loop switch)
- Wooden dowels (part of initiator assemblies)
- Barometer
- Smokeless powders
- Aluminum, magnesium residue
- Potassium chloride, Barium sulfate residue
- Tin juice can
- C-cell batteries
- Solder
- White insulated duplex stranded wire
- Black insulated stranded wire
- Brown insulated stranded wire
- Epoxy
- White glue
- 1/2" filament tape
- 3/4" filament tape
- 3/4" black friction tape
- 3/4" black plastic tape
- 1" masking tape
- Brass wood screws
- 3 penny common nails
- Sheetrock nails
- U-nails
- Monofilament fishing line
- Brown paper with stenciled markings
- Tape tab
- "America's Light fueled by Truth and Reason" U.S. postage $1 stamps
- "Eugene O'Neill" $1 U.S. postage stamps
- "Lucy Stone" $.50 U.S. postage stamps
- "Frederick Douglass" $.25 U.S. postage stamps

D.

June 10, 1980 - Lake Forrest, Illinois
(Explosive Device #4)

24. A few days prior to June 10, 1980, Percy Wood, President of United Airlines, received a type-written letter via U.S. Mail from an Enoch W. Fischer. The letter was sent to Wood's residence in Lake Forest, Illinois, a suburb of Chicago. The letter stated that Fischer was taking the liberty of sending, under separate cover, a book which he indicated had great social significance. On June 9, 1980, the parcel containing the device arrived at Wood's residence, but was not opened by Wood until the afternoon of June 10, 1980. Wood unwrapped the parcel which contained a book entitled

"Ice Brothers" written by Sloan Wilson. Upon opening the book, the device exploded inflicting serious lacerations to Wood's face and upper left leg. Subsequent investigation determined that the addressor, Enoch W. Fischer, was a fictitious person.

25. An analysis of the components of the explosive device revealed that it was constructed of a section of 3/4" diameter galvanized pipe sealed on each end by a combination of nails and epoxy glue. The explosive mixture contained within the pipe was comprised of three types of smokeless powders. The fuzing system consisted of two D- cell batteries, wired in series, through two improvised loop switches to an unknown fusing system inside the pipe). The device was contained within a hollowed out book titled "Ice Brothers" and was designed to detonate upon opening. The device also contained a metal tag with the letters "FC" stamped into it. This was the first incident in which these initials were used.

26. The following components were recovered from the blast scene:

- Remnants of book titled "Ice Brothers"
- Wood fragments
- Epoxy
- White glue
- Smokeless powders
- 1" masking tape
- 3/4" black plastic tape
- 3/4" black friction tape
- 3/4" cellophane tape
- 3/4" filament tape
- 1/2" filament tape
- 3/4" white reinforced tape
- Remnants of 3/4" diameter galvanized pipe
- 3/4" threaded pipe end caps
- Anti-open switch (wire loop switch)
- Common nails
- D-cell batteries
- Blue lined white paper
- Brown paper
- Solder
- White and black insulated duplex stranded wire
- Tape tabs
- Mailing label
- "Frederick Douglass" $.25 U.S. postage stamp
- "Will Rogers" $.15 U.S. postage stamp
- "America's Light fueled by Truth and Reason" $1 U.S. postage
- 5/8" metal tag bearing stamped letters "FC"
- Cardboard from "Bugles Cereal" box
- Newspaper

E.

October 8, 1981 - Salt Lake City, Utah
(Explosive Device #5)

27. This device was contained in a large paper wrapped package and was discovered in the third floor hallway of Bennion Hall Business Building at the University of Utah in Salt Lake City, Utah. The student who discovered the package brought it to the attention of a staff member who notified the campus police. Prior to the police arriving, a student tipped the package whereupon a stick slid out from the bottom. The campus police chief examined the package and, believing it was a bomb, contacted a local Explosive Ordinance Demolition (EOD) team and requested that they respond to the campus. Upon arrival, the EOD team X-Rayed the package and determined that it was in fact a bomb. The device was then rendered safe with a small explosive charge.

28. An analysis of the components of the explosive device conducted by the FBI and Postal Service Laboratories revealed that it was constructed from an 8" length of 1" diameter galvanized pipe sealed on each end with wooden plugs. The explosive mixture contained within the pipe was comprised of at least three types of smokeless powders. The fuzing system consisted of two D-cell batteries, a household on/off switch, an improvised slide switch, and an improvised initiator, arranged in series. The device, which was attached to a gasoline can, was designed to detonate upon lifting the package approximately four inches, thus allowing the slide switch to make contact. The device also contained a metal tag with the letters "FC" stamped upon it. **29.** The following components were recovered from the blast scene:

- Remnants of 1" diameter galvanized pipe
- Wooden end plug
- Wooden stick with copper/metal contacts
- Steel wool
- Three types of smokeless powder
- Match heads
- D-cell batteries
- Gasoline can (one gallon)
- Brown paper
- 1" transparent tape
- 1/2" filament tape
- 3/4" masking tape
- 3/4" black friction tape
- 3/4" black plastic tape
- Duplex transistor speaker wire
- Brown insulated duplex stranded wire
- White insulated duplex stranded wire
- White insulated nylon-fiber reinforced 3-strand wire
- Epoxy
- Wood screws
- multi-filament string
- Brown twine

- GE brand light switch
- Glass tubes
- Box nails
- Wooden box
- Wooden dowel (part of initiator assemblies)
- wooden plug (forced through gas can pour spout)
- 3/4" metal tag bearing stamped letters "FC"

F.

May 5, 1982 - Nashville, Tennessee
(Explosive Device #6)

30. This device was contained in a parcel which was addressed and mailed to Professor Patrick C. Fischer at Pennsylvania State University (PSU), with a return address of Professor LeRoy W. Bearnson at Brigham Young University (BYU) in Provo, Utah. The parcel, which had been mailed from the BYU campus post office, was subsequently forwarded by a secretary at PSU to Fischer at Vanderbilt where he had been teaching for approximately two and one half years. Fischer was out of the country at the time the parcel arrived at Vanderbilt. Janet Smith, Fischer's secretary, opened the parcel, which exploded inflicting serious injuries to her face and arms. During an interview of Dr. LeRoy Bearnson, professor of Electrical Engineering, he stated that he had no knowledge of any such parcel.

31. An analysis of the components of the explosive device conducted by the FBI and Postal Service Laboratories, revealed that it was constructed from a 1-1/2" diameter household sink trap (U-shaped pipe) sealed on either end with wood/metal plugs and nails. The explosive mixture contained within the pipe was comprised of at least five types of smokeless powders. The fuzing system consisted of four D-cell batteries arranged in two independent circuits. Each circuit was wired to include a loop switch and an improvised wooden dowel initiator located inside the pipe. The device was contained in a homemade wooden box which incorporated twin pivoting levers held in tension by multiple rubber bands. The device was designed to detonate upon removal of the outer package wrapping which relieved pressure on the levers, thus closing the loop switches. The device contained a metal tag stamped with the letters "FC."

32. The following components were recovered from the blast scene:

- Remnants of 1-1/2" metal sink trap
- Wood plugs
- Thin metal discs
- Brown paper
- Five types of smokeless powders
- Match heads

- Rubber bands
- D-cell batteries
- Wooden dowels (part of initiator assemblies)
- Wooden discs
- Brown insulated duplex stranded wire
- White insulated duplex stranded wire
- 3/4" black plastic tape
- 3/4" black friction tape
- 3/4" filament tape
- 3/4" masking tape
- Epoxy
- Wood screws
- Multi-filament string
- Nails
- Wood fragments
- Solder
- Anti-open switches (wire loop switch)
- Metal tag bearing stamped letters "FC"
- "Eugene O'Neill" $1 U.S. postal - Mailing label

G.

July 2, 1982 - Berkeley, California
(Explosive Device #7)

33. This device was discovered by Professor Diogenes Angelakos in Room 411 of the Cory Hall Mathematics Building on the University of California, Berkeley campus. Angelakos observed the device sitting on the floor and believed it to be some type of test device or piece of equipment belonging to a student or a construction crew. Upon lifting the handle, the device exploded inflicting serious injuries to Angelakos' right hand, arm, and face.

34. An analysis of the components of the explosive device conducted by the FBI Laboratory revealed that it was constructed from an 8- 1/2" length of 1/2" galvanized pipe sealed on either end with threaded caps. The explosive main charge contained within the pipe was comprised of at least four types of smokeless powders. The fuzing system consisted of four D-cell batteries arranged in two independent circuits. Each circuit was wired to include a loop switch attached to each upright shaft of a handle, which was attached to a wooden box and an improvised wood dowel initiator located inside the pipe. The device consisted of a homemade wooden box which sat on top of a gasoline can. The pipe was suspended in the gasoline can. This device was designed to detonate upon lifting the handle. Incorporated into this device was an ancillary component fashioned to resemble a piece of test or measurement equipment. This component was placed on top of the device and served no functional purpose in it's operation as far as subsequent laboratory analysis has been able to determine. Affixed to this ancillary component was a note bearing the typed phrase "Wu --- It works! I told you it

would. --- RV."

35. The following components were recovered from the blast scene:

- Remnants of 1/2" pipe
- 1/2" size threaded end caps
- Gasoline can (one gallon)
- Wooden dowels (part of initiator assemblies)
- Wooden handle
- Blue lined paper
- Brown paper
- White insulated duplex stranded wire
- Brown insulated duplex stranded wire
- 3/4" black plastic tape
- 3/4" black friction tape
- 3/4" masking tape
- 3/4" filament tape
- 1/2" filament tape
- Epoxy
- Black rubber
- Green paint
- White putty
- Screws
- U-nails
- Staples
- Wooden components
- Solder
- D-cell batteries
- Four types of smokeless powder
- Anti-lift switch (wire loop switch)
- Ancillary component
- Red and black insulated stranded wire
- Leviton toggle switches
- GE flashlight bulbs
- Alligator clips
- 3/4" black plastic tape
- Improvised wooden knob and nail spindle
- Flattened nail pointer

H.

May 15, 1985 - Berkeley, California
(Explosive Device #8)

36. This device, in the form of a three-ring binder affixed to a plastic file box, was discovered by Air Force Captain John Hauser, a graduate student in the University of California Berkeley, Computer Science Department. Hauser observed the device on a table located in Room 264 of the Cory Hall Computer Science Building. Room 264 houses several computer terminals which are frequently used by students in the department. Believing that it was another student's project, Hauser attempted to lift the binder cover to view the

contents. Upon lifting the cover, the device exploded inflicting serious injuries to Hauser's right hand including permanent nerve damage and the loss of four fingers.

37. An analysis of the components of the explosive device conducted by the FBI Laboratory revealed that it was constructed from a length of 3/4" pipe sealed on either end by two plugs fabricated from metal bar stock and secured with metal pins and cable. One of the metal plugs had the letters "FC" stamped into its end. The explosive mixture contained within the pipe was comprised of aluminum powder and ammonium nitrate. The fuzing system consisted of six D-cell batteries arranged in series to include an improvised loop switch and a metal/wooden initiator located inside the pipe. The device was housed in a plastic file box with wooden framework and was designed to explode upon opening the lid.

38. The following components were recovered from the blast scene:

- Remnants of 3/4" and 1" diameter pipe
- Metal shim material (.006" - .009")
- Metal end plugs ("FC" stamped into end of one plug)
- Nail fragments
- U-nails
- Metal shim material (.025" - .030")
- Securing pins (5/16" x 1-1/2", tick marks present on pin and pipe components.
- Metal bracket/straps
- D-cell batteries
- Wooden frame
- Picture cord style wire
- Stranded wire cable
- Brown insulated stranded wire
- Green insulated stranded wire
- 3/4" black friction tape
- 3/4" black plastic tape
- 3/4" masking tape
- Epoxy
- Wooden dowels (part of initiator assemblies)
- Screws
- Lead pieces
- Double pointed 3/8" tacks
- Rubber bands
- Plastic box - Solder

I.

June 13, 1985 - Auburn, Washington
(Explosive Device #9)

39. This device was contained in a parcel, wrapped in brown paper, which was addressed and mailed to the Boeing

Aircraft Company, Fabrication Division in Auburn, Washington, with a return address of Weiburg Tool & Supply in Oakland, California. Subsequent investigation revealed that the aforementioned company, listed on the parcel's return address, was both a fictitious name and fictitious address. The parcel, which had been mailed from Oakland (postmarked May 8, 1985) was not addressed to a specific individual, and therefore, remained in the company interoffice mail until it was partially opened by mail room employees who discovered the enclosed device. Boeing officials notified the King County Sheriff's Bomb Squad, who subsequently rendered the device safe by detonation.

40. An analysis of the components of the explosive device by the FBI and U.S. Postal Service Laboratories revealed that it was constructed from a 13-3/4" length of 1-1/4" diameter pipe. The pipe was sealed on either end by two aluminum plugs and secured by steel bars and epoxy glue. Both of the metal plugs had the initials "FC" stamped into their ends. The explosive mixture contained within the pipe was comprised of aluminum powder and potassium sulfate, a combustion product of black powder. The fuzing system consisted of eight D-cell batteries arranged in two independent four-cell circuits. Each circuit included an improvised slide switch, both of which were connected to a common improvised wood/metal initiator located inside of the pipe. The entire device was encased in a homemade wooden box. Each slide switch was mounted in a channel inside the box and held in tension by a spring. The device was designed to detonate upon removal of the wrapping paper which would open a lever in the box allowing the slide switches to move to the closed position.

41. The following components were recovered from the blast scene:

- 1-1/4" steel pipe
- End plugs (aluminum/magnesium alloy, letters "FC" stamped into ends of both plugs)
- Rectangular securing pins
- Metal shim material
- Metal bands, 3/8" width
- D-cell batteries
- Brown paper
- Three types of tape
- picture cord style cable
- Beige insulated duplex wire
- Green insulated stranded wire
- Epoxy
- Elmer's glue
- Screws
- Nails
- Wooden box
- Wooden chocks

- Wooden switches
- Wooden wafer (part of initiator assembly)
- 2" transparent tape
- 3/4" black plastic-tape
- 3/4" black friction tape
- 1/2" filament tape
- Wooden stick
- Wooden pegs
- Coil springs
- Metal strips
- Solder
- "Of the People By the People For the People" $.22 U.S. postal stamps
- "America's Light Fueled by Truth and Reason" $1 U.S. postal stamps
- Red, white and blue mailing label

J.

November 15, 1985 - Ann Arbor, Michigan
(Explosive Device #10)

42. This device was contained in a parcel which was mailed from Salt Lake City, and was addressed to Dr. James V. McConnell at his home in Ann Arbor, Michigan. At the time of this incident, McConnell was a Professor of Psychology at the University of Michigan. The return name and address marked on the parcel was that of Ralph C. Kloppenburg, Department of History at the University of Utah. Attached to the outside of the package was a letter to McConnell, purportedly signed by Kloppenburg, requesting that McConnell review and critique the enclosed manuscript. When Nick Suino, an assistant to Dr. McConnell, opened one end of the parcel, the device exploded inflicting injuries to Suino's arms and abdomen and injuring McConnell's eardrum. Investigation determined that the addressor, Ralph C. Kloppenburg, was a fictitious person.

43. An analysis of the components of the explosive device conducted by the FBI and Postal Service Laboratories revealed that it was contained in a hollowed-out ream of paper, and was constructed from a 10-1/4" length of 1" galvanized steel pipe. The pipe was sealed on either end by two plugs fabricated from steel bar stock each being secured by two steel pins with epoxy glue and shim material. One end plug was stamped with the letters "FC". In addition to the end construction, the pipe was reinforced on each end with short metal sleeves fashioned from another piece of pipe having an outer diameter of 1-5/16". The explosive mixture contained within the pipe was comprised of aluminum powder and ammonium nitrate. The fuzing system consisted of four D-cell and six AAA-cell batteries arranged in two independent circuits. Each circuit was wired to a spring- loaded triggering switch mechanism connected to a single improvised initiator

located inside of the pipe. The device was designed to detonate upon unwrapping the parcel allowing tension to be relieved on the switch.

44. The following components were recovered from the blast scene:

- Remnants of 1" galvanized steel pipe.
- 3/4" diameter metal end plugs (Letters "FC" stamped into end of one plug)
- 5/16" and 5/32" diameter securing pins, tick marks present on securing pins
- 15/16" diameter metal sleeve
- Metal bands
- Four D-cell batteries
- Six AAA-cell batteries
- Solder
- Remnants of douglas fir wood
- Brown insulated duplex stranded wire
- Red insulated stranded wire
- Single strand steel wire
- 1/2" filament tape
- 3/4" black friction tape
- 3/4" black plastic tape
- 3/4" masking tape
- Epoxy
- 0.060" sheet steel
- Brass and wood screws
- Nail
- Wire staples
- Red paint
- Lead split shot
- Black plastic binder
- Brown paper
- "Of the People By the People For the People" $.22 U.S. postal stamps
- "America's Light Fueled by Truth and Reason" $1 U.S. postal stamps
- Red, white and blue ailing label

K.

December 11, 1985 - Sacramento, California
(Explosive Device #11)

45. This device was left outside the rear door of Rentech Computer Rental Company in Sacramento, California. The device had the appearance of a block of wood, with nails protruding at the ends. Hugh Scrutton, the owner of Rentech, observed the device, and attempted to move or lift it. At that time the device exploded and killed Scrutton.

46. An analysis of the components of the explosive device conducted by the FBI Laboratory revealed that it was

constructed from a 10" length of 1" diameter steel pipe sleeved by a 1-1/4" diameter steel pipe of the same length. Thin metal shim material was fitted between the pipes, apparently to fill any remaining gap. The pipe assembly was sealed on either end by two 1" diameter steel plugs each of which were drilled to accommodate two steel securing pins. One of the end plugs had the letters "FC" stamped into its surface. The explosive mixture contained within the pipe was comprised of aluminum powder and ammonium nitrate. The fuzing system consisted of four D-cell batteries and one 9-volt battery. Each of the D-cell batteries had electric wires soldered to the positive terminals. The precise wiring of the device could not be determined due to the extreme damage. However, it is believed that the device incorporated some form of spring-loaded lever or anti-movement triggering system wired to an improvised initiator located inside of the pipe. This device was designed to detonate upon being moved.

47. The following components were recovered from the blast scene:

- Remnants of 1" and 1-1/4" pipe
- 5/16" diameter metal pins
- 1" diameter metal plugs (Letters "FC" stamped into end of one
plug)
- Metal shim
- Machine screws
- Wood screws
- Metal brackets
- 4 D-cell batteries
- 9-volt battery
- Solder
- Fragments of wood
- Stranded insulated copper wire
- Stranded insulated duplex wire
- 1/2" filament tape
- 3/4" black plastic tape
- 3/4" black friction tape
- 2" masking tape
- Epoxy adhesive
- Varnish
- Red paint
- Common nails
- Aluminum powder particles
- Ammonium nitrate residue
- Potassium chloride residue
- Potassium sulfate residue

L. February 20, 1987 - Salt Lake City, Utah
(Explosive Device #12)

48. On the day of the bombing, an employee of a business in

Salt Lake City, Utah, observed, through the blinds of the rear office window, an unidentified white male bending down next to the witness's car. The employee observed the individual remove from a cloth bag what appeared to be two 2x4 pieces of wood nailed together with protruding nails and place the object near the front left tire of the car. The witness then called to a co-worker in the office, at which time the individual turned and looked up at the witness in the window. The individual then stood up with the bag and walked away through the parking lot leaving the device behind. Approximately an hour later, Gary Wright, Vice-president of CAAMS, Inc., drove his car into the rear parking lot and, after parking, noticed the device laying on the ground. Upon moving, the device exploded inflicting serious injuries to Wright.

49. __ , was an employee of CAAMS, Inc., and provided UTF investigators with a description of the individual who placed the bombing device on February 20, 1987. __ stated his face was expressionless and __ did not see his teeth or anything unusual about his face. __ advised there were no scars and marks on his face, and he had a light strawberry blond colored mustache with no other facial hair. __ described his face as being thin, reddish flush, rough looking complexion, but not with pock marks or other types of deformities. __ indicated __ overall impression of him was that he looked healthy.

50. __ described his hands as being white, more so than his face, with long thin fingers and no hair on his hands that was noticed. __ stated his hands were clean, with no callouses observed, and the fingernails were clean. There were no scars, marks or jewelry on his wrist or hands, and the cuff on the white sweatshirt was gathered at the wrist.

51. __ has been re-interviewed regarding this event. __ has also worked with the UTF and sketch artists in order to develop a composite sketch, a recent composite drawing based on these interviews is attached to this affidavit as attachment 1.

52. An analysis of the components of the explosive device conducted by the FBI and ATF Laboratories revealed that it was constructed from a three layer concentric assembly of 1" and 1-1/4" steel pipes separated by a single layer of thin steel shim material. The pipe assembly was sealed on both ends by plugs fabricated from 1" steel bar stock, each secured with three metal pins and metal shim material. One of the end plugs had the initials "FC" stamped into its end. The explosive mixture contained within the pipe was comprised of aluminum powder and ammonium nitrate. Also present was potassium chloride and potassium sulfate. The fuzing system consisted of four D-cell batteries arranged in a single circuit to include an anti-lift or spring-loaded lever switch and

an improvised initiator located inside of the pipe. This device was designed to detonate upon being moved.

53. The following components were recovered from the blast scene:

- Remnants of 1" and 1-1/4" pipe
- Remnants of shim material
- 5/16" diameter metal pins
- 1" diameter metal plugs (Letters "FC" stamped into end of one
plug)
- Metal straps
- Tan insulated duplex multi-strand wire
- Red insulated single strand wire
- Uninsulated multi-strand wire
- Cable wire
- Clear epoxy
- Grey epoxy
- Aluminum powder residue
- Ammonium powder residue
- Potassium chloride residue
- Potassium nitrate residue
- 3/4" black electric tape
- 3/4" black friction tape
- 3/4" masking tape
- 2" silver duct tape
- 1", 3/4", 1/2", and 1/4" clear fiber reinforced tape
- Iron bridge wire (initiator)
- 1" diameter wood discs
- Lead wedges
- Metal plates
- Nails
- Screws
- D-cell batteries
- Wood fragments

M.

June 22, 1993 - Tiburon, California
(Explosive Device #13)

54. This device was contained in a padded envelope and was mailed to Dr. Charles Epstein at his residence in Tiburon, California. Dr. Epstein was a professor at the University of California, San Francisco, Medical School. The parcel was mailed from Sacramento, California, with a return address listed as James Hill, Chemistry Department, California State University, Sacramento, California. Mr. Hill has been interviewed and has no knowledge of the parcel. Shortly after noon on June 22, 1993, Epstein's daughter retrieved the parcel from the mailbox and placed it on the kitchen counter. At approximately 4:30pm that day, Dr. Epstein returned to his residence and began to open his mail. Upon opening, the

parcel exploded inflicting serious injuries to Dr. Epstein.

55. An analysis of the components of the explosive device was conducted by the FBI Laboratory and revealed that the device was constructed from an approximately 6" length of 3/8" copper tubing sealed on both ends by plugs comprising of metal, wood, and epoxy, which were secured by 1/8" metal pins. The explosive material contained within the tubing was comprised of a mixture of potassium chlorate and aluminum powder. The fuzing system consisted of four 9-volt batteries, an improvised anti- open switch, and an improvised initiator. The exact wiring of this device cannot be determined due to the fragmented condition of the components. The device was housed in a small homemade box fashioned from redwood. This device was designed to detonate upon opening the package.

56. The following components were recovered from the blast scene:

- Remnants of 3/8" copper tubing
- Metal end plugs
- Metal disks
- Wooden dowel (part of initiator assembly)
- 1/8" diameter metal pins
- Four 9-volt batteries
- Potassium Chlorate residue
- Aluminum powder residue
- Solder
- Remnants of redwood
- Black insulated stranded wire
- White insulated stranded wire
- Black insulated single strand wire
- Uninsulated single strand wire
- Monofilament tape
- 3/4" black plastic tape
- 3/4" transparent tape
- Clear/yellow epoxy
- Improvised metal/wood flip switch
- Staples
- Rubber bands
- Spring
- Paper clip
- Screws
- Screen material
- Lead strips
- Red pull tab
- Padded envelope
- "USA Flag-Olympic Ring" $.29 U.S. postage stamps

N.

June 24, 1993 - New Haven, Connecticut

(Explosive Device #14)

57. This device was also contained in a padded envelope and was mailed to Dr. David Gelernter at his office in the Computer Science Department of Yale University, New Haven, Connecticut. The parcel was mailed from Sacramento, California, postmark dated June 18, 1993, with a return address listed as Mary Jane Lee, Computer Science, California State University, Sacramento, California. Professor Lee has been interviewed and has no knowledge of the parcel. Gelernter arrived at his office at approximately 7:00 am on June 24, 1993, and immediately began to open his mail. The parcel exploded upon opening, inflicting serious injuries to Dr. Gelernter. The mailing labels and padded envelopes appear to be identical in both the Epstein and Gelernter bombings.

58. An analysis of the components of the destructive device conducted by the FBI Laboratory revealed that the device was constructed from an approximately 6" length of 3/8" copper tubing sealed on both ends by plugs constructed from metal, wood, and epoxy and secured by 1/8" metal pins. The explosive material contained within the tubing was comprised of a mixture of potassium chlorate and aluminum powder. The fuzing system consisted of four 9-volt batteries, an improvised anti-open switch, and an improvised initiator. The exact wiring of this device cannot be determined due to the fragmented condition of the components. The device was housed in a small homemade box fashioned from redwood. This device was designed to detonate upon opening. It appears to be identical to the explosive device sent to Dr. Epstein.

59. The following components were recovered from the blast scene:

- Remnants of 3/8" copper tubing
- Metal end plugs
- Metal disks
- Wooden dowel (part of initiator assembly)
- 1/8" diameter metal pins
- Four 9-volt batteries
- Potassium Chlorate residue
- Aluminum powder residue
- Solder
- Remnants of redwood
- Black insulated stranded wire
- White insulated stranded wire
- Black insulated single strand wire
- Uninsulated single strand wire
- Monofilament tape
- 3/4" black plastic tape
- 3/4" transparent tape
- Epoxy

- Improvised metal/wood flip switch
- Staples
- Rubber bands
- Spring
- Paper clip
- Screws
- Screen material
- Lead strips
- Red pull tab
- Padded envelope
- "USA Flag-Olympic Ring" $.29 U.S. postal stamps

O.

New York Times Letter - June 2d, 1993

60. On June 24, 1993, Mr. Warren Hoge, Assistant Managing Editor for the New York Times, received a letter from an individual or individuals claiming to be an anarchist group calling themselves "FC". The letter was mailed from Sacramento as were the explosive devices sent to Dr. Epstein and Dr. Gelernter. The writer(s) noted in the letter that the postmark on the letter preceded a newsworthy event and indicated that the FBI was aware of their identities. The date on the postmark preceded the detonation of the two explosive devices sent to Drs. Epstein and Gelernter. The writer of the letter provided "an identifying number that will ensure the authenticity of any future communication from us ...". The number, 553-25-4394, was provided in a format similar to a Social Security Account Number.

P.

December 10. 1994 - North Caldwell, New Jersey
(Explosive Device #15)

This device was housed inside a homemade wooden box which was placed inside a white cardboard box . The package was mailed from San Francisco, California postmark dated 12/3/94 to the residence of Thomas J. Mosser at 15 Aspen Drive, North Caldwell, New Jersey. The package had a return address of H. C. Wickel, Department of Economics, San Francisco State University, San Francisco, California 94132. Subsequent investigation determined that there was no faculty member or student at San Francisco State University by that name, and no record of any such individual has been located. On the morning of December 10, 1994, Mosser opened the package, which exploded and killed him.

62. An analysis of the components of the destructive device conducted by the FBI Laboratory revealed that the device was constructed from a length of aluminum pipe (measuring at least 6- 1/2" in length but no longer than 9-1/2" and having an inside diameter of 13/16", with a wall thickness of 1/16").

Both ends of the aluminum pipe were sealed with metal end plugs having an outside diameter of approximately 13/16" and a length 1-3/8". Each metal plug was secured in place with two metal locking pins, 90 degree opposing, measuring approximately 1-1/2" in length and having a diameter of 1/4". A steel collar was placed over each end of the pipe containing the end plugs and secured in place with the same locking pins which cross through the end plugs. The explosive device was housed in a homemade wooden box, secreted inside a white cardboard box, aproximately 9-1/2" in length, by 7-1/4" in width, 2 1/4" in height. The white cardboard box had additional sections of white cardboard glued to the inside of the box to form a double wall thickness. The construction of the wooden box was similar to the construction of the wooden boxes utilized in devices 13 and 14. Double edged razor blades and numerous paneling nails, approximately 1" in length, were placed in the explosive device for additional shrapnel. It was designed to function as an anti-personnel device. The explosive mixture contained within the aluminum pipe was comprised of sodium chlorate and aluminum. The fusing system consisted of four 9-volt batteries, an improvised anti-open switch (similar to a flip switch design in devices 13 and 14), and an improvised initiator. The exact nature of the switching mechanism and the wiring schematic cannot be determined due to the fragmented condition of the components. The device was designed to detonate upon opening.

63. The following components were recovered from the blast scene:

- 15/16" aluminum pipe fragments
- Metal end plugs
- Steel collars
- 1/4" diameter metal pins
- Four 9-volt batteries
- Ringshank nails
- Screws
- Razor blade fragments
- Sodium Chlorate residue
- Aluminum residue
- Solder
- Wood debris
- Small spring
- Green paneling nails
- Green insulated multi-strand wire
- Red insulated single strand wire
- White insulated multi-strand wire
- Black insulated multi-strand wire
- 3/4" monofilament tape
- 3/4" black plastic tape
- 3/4" black friction tape
- Epoxy
- Improvised metal/wood flip switch

- White cardboard fragments
- "Eugene O' Neill" 61 U.S. postage stamps - USA Flag $.25 postal stamps
- Red, white and blue mailing label

Q.

Dr. David Gelernter Letter - April 24, 1995

64. On April 24, 1995, Dr. Gelernter, the victim of device number 14, received a letter from "FC". The letter was postmarked in Oakland, California with the date of April 20, 1995, and was addressed to Gelernter at the Department of Computer Science, Yale University. The return address was "Ninth St. and Pennsylvania Ave. NW Washington, DC 20535". This is the address of the F.B.I. Headquarters building. The letter, which was opened by Gelernter's assistant, states in part, that... "there are a lot of people out there who resent bitterly the way "echo-nerds like you are changing the world and you wouldn't have been dumb enough to open an unexpected package from an unknown source". The letter continues, discussing the contribution of computers to "invasion of privacy, ... genetic engineering, ... (and) environmental degradation through economic growth", "If there were no computer scientists there would be no progress in computer science". The letter states that "Warren Hoge" of the New York Times could confirm that the letter came from "FC."

R.

Dr. Phillip A. Sharp Letter - April 24. 1995

65. On April 24, 1995, Dr. Phillip A. Sharp received a letter addressed to him at the Biology Department, Massachusetts Institute of Technology, Boston, Massachusetts. The letter had a postmark of Oakland, California and was dated April 20, 1995. The contents of the letter read as follows: "Dr. Sharp: It would be beneficial to your health to stop your research in genetics. This is a warning from FC. Warren Hoge of the New York Times can confirm that this note does come from FC." The letter had a return address of Manfred Morari, 2735 Ardmore Road, San Marino, California 91108-1768. Morari was interviewed by the UTF and stated he had no knowledge of the letter.

S.

Dr. Richard J. Roberts Letter - April 24, 1995

66. On April 24, 1995, Dr. Richard J. Roberts received a letter which had been addressed to him at New England Biolabs, Beverly, Massachusetts 01915. The letter, with the exception of the addressee, contained the same language as the letter to Dr. Sharp. The letter had a postmark of Oakland, California

and was dated April 20, 1995.

T.

New York Times Letter - April 24, 1995

67. On April 24, 1995, Mr. Warren Hoge, Assistant Managing Editor for the New York Times, received a "message from FC" in a letter form which also contained the number 553-25-4394, as did the previous New York Times letter of June 24, 1993. The letter was mailed from Oakland, California, as were the other letters dated April 20, 1995 to Gelernter, Sharp and Roberts. The letter discusses several of the past devices and why victims Epstein, Gelernter, and Mosser were selected by F.C.

68. According to this letter Thomas Mosser was selected "because he was a Burston-Marsteller executive. Among other misdeeds, Burston-Marsteller helped Exxon clean up its public image after the Exxon Valdez incident". Individuals at universities who were "attacked have been specialists in technical fields", which included "certain areas of applied psychology, such as behavior modification". The letter explained that its author is a group of anarchists, whose goal is to "break down all society into very small, completely autonomous units...", ultimately resulting in the "destruction of the world industrial system" through their bombings. The letter then discusses the "group of anarchists" construction and evolutionary testing of the devices. The result, according to the letter was the ability to "pack deadly bombs into ever smaller, lighter and more harmless looking packages. On the other hand, we believe we will be able to make bombs much bigger than any we've made before". The letter then proposes a "bargain", concerning the publication of an article, 29,000 to 37,000 words in length. The publication of the article, according to the "group's" conditions, would result in the termination of "terrorist activities". However, the letter distinguishes "terrorism" from "sabotage", in that terrorism is primarily directed against human beings, while sabotage is against property. The letter stated "We reserve the right to engage in sabotage."

U.

April 24, 1995 - Sacramento. California
(Explosive Device #16)

69. This device was housed inside a wooden box which was covered with brown wrapping paper, bound by filament tape. The package was mailed from Oakland, California, and was addressed to William Dennison, Timber Association of California, 1311 I Street, Sacramento, California. The Timber Association of California however, had changed its name to the California Forestry Association, several years earlier, but

had retained the same Sacramento address. The package had a return address of Closet Dimensions, Oakland, California. On the afternoon April 24, 1995, Gilbert B. Murray, President, California Forestry Association, opened the package, which exploded and killed him.

70. An analysis of the components of the destructive device conducted by the FBI Laboratory revealed that the device was constructed from a unknown length of lead pipe. The pipe had been intentionally scored to increase the potential of smaller shrapnel fragments. The explosive device was housed in a wooden box, covered with brown wrapping paper, secured by 3/4" filament tape. Two cast aluminum disks, approximately 3 1/2" in diameter, and approximately 7/16" thick, were also recovered. These disks appear to be of a "homemade" origin, containing numerous steel wires, believed to have been used for reinforcement purposes. The construction of the wooden box was similar to the wooden boxes utilized in devices 13, 14, and 15. Contained in the device was an undetermined length of approximately 3/8" copper tubing, which had an approximate wall thickness of .030". One end of the tube was sealed by a metal plug, secured in place by an approximate 1/8" metal pin. A partial closure plug for the opposing end was approximately 3/8" in diameter, and 3/8" in length. This plug exhibited two hole passing through the axis, which could have been used to contain the hot wire igniter. The construction of the copper tube and end plug is similar in construction to the copper tubing used in devices 13 and 14. The explosive mixture contained within the lead pipe was comprised of potassium chlorate and aluminum powder. The fuzing system consisted of at least four 9-volt batteries. The exact nature of the switching mechanism and the wiring schematic cannot be determined due to the fragmented condition of the components.

71. The following components were recovered from the blast scene:

- Lead pipe fragments
- Copper tube fragments
- 1/8" diameter metal plug
- Four 9-volt batteries
- Screws
- Potassium Chlorate residue
- Aluminum residue
- Solder
- Wood debris
- Small spring
- White insulated single conductor, multi-strand wire
- Black insulated single conductor, multi-strand tinned wire
- Uninsulated single strand steel wire, 0.030 diameter
- Uninsulated single strand steel wire, 0.012 diameter
- 3/4" filament tape

- 7/16" filament tape
- 1/4" filament tape - Improvised metal/wood switch
- "Eugene O' Neill" $1 U.S. postage stamps
- "G" Series USA Old Glory postal stamps

V.

San Francisco Chronicle Letter - June 24. 1995

72. On June 27, 1995, Mr. Jerry Roberts, Editorial Page Editor, San Francisco Chronicle, received a letter addressed to him at the office address of 901 Mission Street, San Francisco, California, 94103. The letter had a postmark of San Francisco, California, and was dated June 24, 1995. The letter had a return address of Fredrick Benjamin Isaac Wood, 549 Wood Street, Woodlake, California 93286. The letter claimed to be a warning from "The terrorist group FC, called unabomber by the FBI". The letter stated that the group was planning to "blow up an airliner out of Los Angeles International Airport some time during the next six days". The letter then provided the first two digits of "the identifying number" as 55.

W.

New York Times Letter - June 2d, 1995

73. On June 28, 1995, Mr. Warren Hoge, Assistant Managing Editor for the New York Times, received a "message from FC", which supplied the identifying number, 553-25-4394. The envelope had a postmark of San Francisco, California, which was dated June 24, 1995. The letter had a return address of Calgene Inc., 1920 5th Street, Davis, California 95616. Enclosed with the message was a "manuscript" of approximately 65 pages, which "FC" wished to have published, as had been previously stated in the April 24, 1995 letter to Hoge. The message then continued to set forth various terms and conditions as to the rights of the publisher who prints the manuscript. The last paragraph of the message stated "We have no regret about the fact that our bomb blew up the 'wrong' man, Gilbert Murray, instead of William N. Dennison, to whom it was addressed."

X.

Washington Post Letter - June 24, 1995

74. On June 27, 1995, Mr. Michael Getler, Deputy Managing Editor, Washington Post received a "message from the terrorist group FC". The envelope had a postmark of San Francisco, California, which was dated June 24, 1995. The letter had a return address ___ The message then mentions the group's "bombing at the California Forestry Association", and its "offer to desist from terrorism if a manuscript" were published according to their terms. Enclosed with the

message was a carbon copy of the same "manuscript" sent to the Mr. Hoge at the New York Times, on June 24, 1995, along with a copy of the message also sent to the New York Times. The Washington Post message also sets forth various terms for publication, and offers the New York Times as a source for authenticating the communication.

Y.

Penthouse Magazine Letter - June 24, 1995

75. On June 29, 1995, Mr. Bob Guccione, Penthouse Magazine, received a "message from FC" in letter form. The envelope had a postmark of San Francisco, California, which was dated June 24, 1995. The letter had a return address ___ The letter to an earlier offer by Penthouse to publish a manuscript from FC in exchange for the group's "promise to desist from terrorism". The letter also stated that authentication of the communication could be made through contact with the New York Times, as it was familiar with the "secret identifying number, which is known only to the New York Times and the FBI". Enclosed with the Penthouse letter was a copy of the same message and manuscript sent to the New York Times. The letter to Penthouse then mentioned the terms and conditions for the manuscript's publication in Penthouse but stated a preference for publication in the New York Times or the Washington Post. The letter further stated as an "incentive" for the New York Times or another "respectable" periodical to publish the manuscript, the group states "if our manuscript is published in Penthouse, and is not published and distributed through 'respectable' channels" the group would desist permanently from terrorism, but that it would "reserve the right to plant one (and only one) bomb, intended to kill, AFTER our manuscript has been published."

76. The Guccione/Penthouse letter then references and discusses excerpts from an unknown 1985 letter, allegedly sent by the group to the "Examiner". It also stated that FC stands for "Freedom Club". The alleged letter took responsibility for Devices 7 and 8, at the University of California, Berkeley, Device 6 at Vanderbilt University, and Device 5 at the University of Utah, "among others". The remainder of the Penthouse message contains other alleged excerpts from the 1985 letter which further describes the goals and objectives of Freedom Club.

Z. Scientific American Magazine Letter - June 24, 1995

77. On June 28, 1995, ___ , Scientific American, received a two page letter referencing an article, by Russell Ruthen, "Strange Matters: Can Advanced Accelerators Initiate Runaway Reaction ?", from August, 1993 magazine publication. The letter then proceeds to discuss technical advances by scientists and other entities, and the negative

aspects of these developments on society. In the last two paragraphs of the letter, the author is identified as "the terrorist group FC", and quotes paragraph four of the New York Times letter dated June 24, 1995, for purposes of authentication . The envelope was not retained by the recipient.

ZZ.

Dr. Tom Tyler Letter - June 24, 1995

78. On June 30, 1995, Dr. Tom Tyler, Social Psychology Group, University of California, Berkeley, received a "message from FC" in letter form. The envelope had a postmark of San Francisco, California, which was dated June 24, 1995. The letter had a return address ___ The letter referenced "a newspaper article" in which Dr. Tyler commented on "recent bombing, including ours". Enclosed was a carbon copy of the same manuscript which had been sent to the New York Times, Washington Post, and Penthouse Magazine. The letter discusses the rational and irrational components of human behavior and posed several questions to Dr. Tyler concerning technology, the future, and its effect on the human race.

III

COMMONALITIES AND SIMILARITIES PERTAINING TO THE EXPLOSIVE DEVICES AND THE INCIDENTS

79. The commonalities and the similarities between the incidents and the 16 explosive devices demonstrate that the individual(s) who constructed the devices acted in a continual and consistent pattern of activity from the time of the first bomb in 1978 until the present day. The following paragraphs list these commonalities and similarities.

80. Explosive Device Construction - All of the devices have been characterized as "passive" in that they were designed to function upon some action by the victim/target. All of the devices were designed with an element of deception to solicit the interaction of the victim.

81. Explosive Main Charges - The main charges in devices 1 through 7 are similar in that each was comprised primarily of a variety of smokeless powders supplemented in some incidents by match heads. The main charges present in devices 8 through 12 were comprised of similar mixtures of aluminum and ammonium nitrate powders. The main charges present in devices 13, 14 and 16 was comprised of similar mixtures of potassium chlorate and aluminum powders. The main charge present in device 15 was comprised of a mixture of sodium chlorate and aluminum.

82. Main Charge Housings - The main charge housing in all of the explosive devices, with the exception of devices 2 and 3, consisted of a length of metallic pipe. The construction exhibited in devices 11 and 12 are nearly identical in that each consisted of a three layer concentric assembly of 1" and 1-1/4" steel pipes separated by a thin steel shim and closed on each end by 1" diameter steel plugs. The lengths of 1-1/4" steel pipe for these two devices are consistent with having originally been one contiguous piece. The lengths of 1" steel pipe and the thin steel shim material placed between the two pipes also could have originated from the same stock. Devices 8 and 10 are similar in that each incorporated a 1-1/4" diameter collars around each end of the 3/4" pipe. Both pipes were closed on each end by a 3/4" steel plug. All of the end plugs in devices 8, 10, 11, and 12 were secured by 5/16" diameter pins. Devices 8, 10 and 11 are similar in that the ends of the securing pins displayed small tick marks. Device 15 is similar to devices 8 and 10 in that it incorporated a metal collar over each end of the main charge tube. Device 15 also utilized metal end plugs, similar to devices 8, 10, 11, and 12, which were secured in place by 1/4" metal locking pins, 1-1/2 " in length. The main charge housings in devices 13 and 14 are nearly identical in construction. Both incorporated an approximately six inch length of 3/8" copper tubing sealed on one end by wooden dowel end plug and secured by a 1/8" pin. The other end of the tubing was sealed with a metal plug and secured by a 1/8" metal pin. The wooden end plug in each device was hollowed out and filled with epoxy adhesive to allow the passage and securing of twin initiator wires. Attached to the ends of both copper tubes were metal disks which served as a mount to each wooden box. Part of the initiation system in device 16 consisted of a copper tube construction with metal end plugs pinned in place with 1/8" pins, which was similar to the main charge housings in devices 13 and 14.

83. Fusing Systems - All of the devices with the exception of the first device employed similarly constructed electrical fusing systems. Each of these devices included a power source, similar wiring arrangements, a switch, and an initiator. The power sources in devices 2 through 12 are similar in that they consisted of varying numbers of batteries joined together by soldering wires to their respective terminals. The use of D-cell batteries was common to devices 4 through 12. The power sources in devices 13, 14, 15 and 16 are identical in that they each consisted of at least four nine volt batteries. The removal of the outer battery casings was observed in devices 11 through 16. Soldering was used to connect the wiring to the battery terminals. All devices, except for 1 and 7, exhibited soldering in excess of that needed to perform the task. Common in the wiring of each of these devices was the use of separated, multi-strand duplex wire normally encountered in household appliances. The improvised loop switches observed in devices 2, 3, 4, 6, 7,

and 8 are extremely unusual and exhibit nearly identical construction techniques. With the exception of device 3, all of the loop switches were constructed from separated, duplex multi-strand wire. The insulation on the wires in devices 11 and 12 bear the same extrusion marks and, therefore, were made on the same machine. The brown stranded wire used in devices 8 through 12 has the same physical characteristics and many lengths bear the marking, SPT-2 E-11981, thus possibly having been obtained from the same source. Devices 13, 14 and 15 incorporated a type of improvised flip switch. The improvised initiators present in devices 2, 3, and 5 through 8 were assembled in a similar fashion and consisted of a wooden dowel, a pair of wires, and a bridgewire. The initiator assemblies present in devices 9 through 15 are similar to devices 5 through 8 in that they were designed to accommodate a pair of initiator wires in a similar arrangement. Devices 10, 11, and 12 utilized red insulated, multi- strand wire for the initiator wires.

84. Tape - All of the explosive devices are similar in that each contained numerous types of tape used in the assembly and packaging of the device. Present in all of the devices was 3/4" black plastic tape.

85. Wooden Box/Frame Construction - With the exception of device 2, all of the devices incorporated some form of a wooden box or frame, hand-fashioned and fabricated from a variety of wood types utilizing various types of nails, screws and other fasteners. Devices 11 and 12 exhibited nearly identical construction in that both were fabricated from a piece of construction lumber with nails protruding from one side giving each the appearance of a hazard. This disguising technique is also evident in devices 5, 7, and 8, where the devices were constructed to give the appearance of something that would invite attention. The box construction exhibited in devices 13 and 14 were nearly identical. Each of these devices were fabricated from 1/4" wood and had external dimensions of approximately 8" x 4" x 1-1/2".

86. Letters "FC" - These letters are associated with all of the devices with the exception of 1, and 2. Metal tags approximately 1/2" to 5/8" wide bearing the stamped letters "FC" were recovered from devices 4, 5, and 6. Devices 8 through 12 revealed the same stamped letters on the main charge housing end plugs. The letters "FC" were directly associated with devices 5, 13, 14, and 15, in the letter to the New York Times, postmarked April 20, 1995; devices 3, 6, and 16, in the letter to the New York Times, postmarked June 24, 1995; devices 5, 6, 7, 8, and 11, in the letter to Penthouse Magazine, postmarked June 24, 1995; and device 16, in the letter to Scientific American, received in June, 1995.

87. Typewriter impressions - Qualified document examiners have conducted comparisons of the typewriter impressions

appearing on documentary evidence recovered from Device 6, 7, 9, 10, 13, 14, and 15. They have also compared the typed letters sent to Dr. David Gelernter, Dr. Phillip A. Sharp, Dr. Richard J. Roberts, Dr. Tom Tyler, the San Francisco Chronicle, Scientific American, Penthouse Magazine, Washington Post and the New York Times, dated June 24, 1993 and April 24, 1995. They have concluded the same typewriter was used to type all these documents. No typewriter impressions were recovered from the crime scene of device 16, due to a small fire which occurred after the device detonated.

88. Stapler - Tool Marks - Qualified examiners have conducted comparisons of the various staples used in devices 13, device 14, and the letters sent to the New York Times, postmarked June 25, 1995, Penthouse Magazine, postmarked June 24, 1995. They have concluded that unique marks left upon some of the staples are identical. The following staples had identical tool marks: three of the staples removed from the New York Times letter, one of the staples from the Penthouse letter, two of the staples from device 13, and one of the staples from device 14.

89. Victims - Most of the victims, or intended victims, fall into four categories: (1) airline-related, (2) university-related, (3) computer- related, and (4) Public Relations. Some of the victims fall into more than one category. Airline-related victims are in devices 3, 4, and 9. University-related victims are in devices 1, 2, 5, 6, 7, 8, 10, 13, and 14. Computer-related victims are in devices 6, 7, 8, 10, 11, 12, and 14. The victims in devices 15 and 16 were employed in businesses which dealt with public relations issues.

90. Misleading Return Address - Nine devices were mailed and one device was placed near a business to appear as a mailed or delivered item. Of these ten devices, at least nine utilized deceptive or misleading return addressers and addressees, as opposed to no return address. Devices 4, 9, 10, and 15, utilized fictitious return addressers. Devices 1, 6, 13, 14, and 16 utilized actual persons or businesses as return addressers; however, these entities had no known connection to the mailings. Device 3 was mailed; however, due to the extreme damage caused to the parcel, no addresses could be discerned.

91. "Priority Mail" Stamp - The use of the "Priority Mail" stamp on the outer parcel wrapping was observed in devices 6, 10, 13, 14, 15 and 16.

92. United States Postal Stamps - All of the ten mailed devices utilized United States postage stamps, as opposed to having a postage metering strip. Nine different types of stamps, in varying combinations, appeared on the ten different devices. Four different stamps depicting the United States Flag were

used. The first was a 29 cent, U.S. Flag with the Olympic Rings, which was first issued in April 1991. This stamp appeared on devices 13, 14 and the letter to the New York Times, dated June 24, 1993. The second stamp depicts the U.S. Flag in front of the United States Capitol. This 22 cent stamp was first issued in March 1985, and appeared on devices 9, 10, and 15. The third stamp has the U.S. Flag with a background setting of clouds. This stamp was first issued in May 1988, and appeared on device 15. The fourth U.S. Flag stamp, was the 32 cent "Old Glory" G Series. It was used on device 16, and the letters sent to Dr. David Gelernter, Dr. Phillip A. Sharp, Dr. Richard J. Roberts, and the New York Times (April 24, 1995) . The "Old Glory" G Series 32 cent stamp was also used on the packages and letters sent to the San Francisco Chronicle, New York Times, Washington Post, Penthouse Magazine, and Dr. Tom Tyler, all of which were postmarked June 24, 1995. The envelope from the Scientific American letter was not retained by the recipient. Three of the device stamps used were from the Prominent Americans series, to include the Eugene O'Neill, Lucy Stone, and Frederick Douglass stamps. The $1.00 O'Neill stamp, in sheet version, was first issued in October 1967 and appeared on devices 1, 3 and 6. The $1.00 O'Neill stamp, in roll version, was first issued in January 1978 and appeared on device 15 and 16. The 50 cent Lucy Stone stamp was first issued August of 1968 and appeared on device 3. The 25 cent Frederick Douglass stamp was first issued in February 1967 and appeared on devices 3 and 4. The last two stamps were a 15 cent Will Rogers, from the Performing Arts and Artists Series, and a $1.00 Rush Lamp and Candleholder, also known as "America's light fueled by truth and reason". The Will Rogers stamp was first issued in November 1979 and was used on device 4. The Rush Lamp and Candleholder was first issued in July 1979 and appeared on devices 3, 4 , 9 and 10. Device 16 also had $ 2.90 stamps affixed to the face of the package. The type of exact type of stamp is unknown, and is believed to have been consumed in a small fire that resulted after the device detonated.

93. Geographic Areas of Incidents and Mailings - Several devices are related to the Chicago, Illinois area. Devices 1 and 2 were placed at universities in the Chicago metro area. Devices 3 and 4 were mailed from the Chicago metro area. The victim of device 4 resided in Lake Forest, a suburb of Chicago. Other devices are associated with the Salt Lake City/Provo, Utah, area. Devices 5 and 12 were placed in Salt Lake City. Devices 6 and 10 were mailed from the Salt Lake City/Provo area. Seven devices are associated with the Northern California area. Devices 7 and 8 were placed in Berkeley, California. Device 11 was placed in Sacramento, California, and devices 13, 14 and the New York Times letter dated June 24, 1993, were mailed from that area. Device 13 was mailed to the victim who resided in Tiburon, a suburb of San Francisco. Device 15 was mailed from San Francisco,

California to the victim who resided in North Caldwell, New Jersey. The packages and letters sent on June 24, 1995, to the San Francisco Chronicle, New York Times, Washington Post, Penthouse Magazine, and Dr. Tom Tyler, were all postmarked San Francisco, California. Device 16 was mailed in Oakland, California to a victim in Sacramento, California. The letters sent to Dr. David Gelernter, Dr. Phillip A. Sharp, Dr. Richard J. Roberts, and the New York Times dated April 24, 1995, were all postmarked in Oakland, California.

94. Mailing Labels - Eight of the devices were packaged with pre- printed mailing labels affixed to the outside. Devices 1, 4, and 6 had identical labels believed to be manufactured by Dennison. Devices 9 and 10 had identical labels from an unknown source. Device 15 had the same type of mailing label consistent with device 9 and 10, with the exception that the lower portion of the device 15 label has been removed along the manufacturers prescored line. Devices 13, and 14 had identical appearing labels, believed to be manufactured by Quikstik.

IV

STATEMENT OF PROBABLE CAUSE FOR THEODORE JOHN KACZYNSKI'S CONNECTION TO UNABOM EVENTS AND FOR THE SEARCH OF HIS RESIDENCE

A. Identity 95. Beginning on February 14, 1996, David Kaczynski informed members of the UNABOM Task Force (UTF) that he believes his brother Theodore John Kaczynski, also known as "Ted", to be the person responsible for the UNABOM event. David Kaczynski initiated contact with the FBI through an attorney. He stated that he did not want any of the reward money offered in connection with this investigation.

96. Investigation by the UTF has revealed that Theodore John Kaczynski is a white male, 5'9", 150 pounds, with a date of birth of May 22, 1942. He has a Montana driver's license #342-34-3701 with a listed address as HCR 30, Lincoln, Montana and a mailing address of P.O. Box 524, Lincoln, Montana.

97. A warranty deed dated June 19, 1971 in the County of Lewis and Clark, State of Montana indicates that Clifford Gehring, Sr. sold a 1.4 acre parcel of land with the right of ingress and egress from Stemple Pass to Theodore John Kaczynski and his brother David R. Kaczynski. The property was more particularly described as four miles south of Lincoln, Montana, 1/4 mile east of Stemple Pass Road on Canyon Creek.

B. DNA

98. A postage stamp obtained from the envelope used to mail a copy of the FC manuscript to Dr. Tom Tyler was subjected to DNA analysis by the FBI Laboratory-DNA Section. The results of that analysis were compared to results obtained from the postage stamp and envelope flap of a letter sent by Theodore Kaczynski to his brother David Kaczynski. Based upon the analysis of the DQ alpha (DQA1) and the Polymarker (PM) Loci, the source of the DNA on the known sample (Theodore Kaczynski's letter to Dave Kaczynski) is included as a potential contributor to the DNA detected on the stamp from the letter received by Dr. Tyler.

99. The estimated probability expressed as a percentage of selecting an unrelated individual at random from the population having DQA1 type 1.1,2 as detected in these specimens, is approximately 3 percent of Caucasians, 3 percent of Blacks, and 5 percent of Southeastern Hispanics and 2 percent of Southwestern Hispanics.

100. It is noted by your affiant that at least one of the victims previously mentioned and another suspect in the UNABOM investigation (whose identity is known to the UTF) have shared the same DNA Polymarker as Theodore Kaczynski. Because employment records for this person conflicted with known UNABOM events, UTF investigation eliminated this individual as a UNABOM subject.

C. Background

101. Theodore Kaczynski's brother, David Kaczynski, has informed UTF investigators that he developed a suspicion of Theodore Kaczynski's (hereafter referred to as Theodore Kaczynski, or as David Kaczynski's brother if appropriate) involvement in the series of bombings committed by the UNABOM subject after reading news media reports, in approximately December, 1994, that summarized the dates and places of the UNABOM events and bombings.

102. David Kaczynski informed the UTF that he and his brother grew up in Chicago, Illinois (the locale of the first four bombings); his brother had obtained his doctorate from the University of Michigan (the location of a mail bomb victim targeted by the UNABOM subject); his brother had taught at the University of California at Berkeley (the site of two UNABOM bombings); and his brother had lived and worked in Salt Lake City, Utah (the location of several UNABOM events.)

103. Independent investigation conducted by the UTF revealed that Theodore Kaczynski graduated from Evergreen Park High School in Evergreen Park, Illinois. He also attended Harvard University from 1958-1962, where he obtained a Bachelor of Arts degree in 1962. Theodore Kaczynski attended the University of Michigan at Ann Arbor,

Michigan from 1963-1967, where he earned both his master's and doctorate.

104. Independent investigation conducted has further revealed that Theodore Kaczynski was employed as an Assistant Professor of Mathematics from July 16, 1967 through June 30, 1969 at the University of California, Berkeley (UCB).

105. David Kaczynski has advised investigators that following his reading of published excerpts from the UNABOM manuscript in approximately August, 1995, he became increasingly suspicious of strong similarities between Theodore Kaczynski's views and those of the UNABOM subject. He further stated that upon reading the published UNABOM manuscript in its entirety, in approximately September, 1995, he became convinced that his brother was the author of the UNABOM manuscript. In particular, David Kaczynski stated that there was a unique phrase in the UNABOM manuscript, which referred to a "cool-headed logician" which he, David Kaczynski, recognized as his brother's terminology. David Kaczynski stated that this and other statements in the UNABOM manuscript "leapt out" at him because they expressed his brother, Theodore Kaczynski's, long-held position on the role of art versus science in our society. According to David Kaczynski, these statements marked the UNABOM manuscript as his brother's product, because he and his brother had a running argument for years on these topic.

106. David Kaczynski advised investigators that he recognized, in particular, a paragraph in the first portion of the manuscript that spoke of art and the human experience. Paragraph 17 of the UNABOM manuscript (attachment 2) discusses art and rationality.

107. David emphasized that his brother has long been committed to "rationality" as a guiding principle. He further stated that since his brother's ideas were based on a "rational ideal", any action in support of them was justifiable. David Kaczynski expressed his sadness to investigators in commenting that this type of justification would enable his brother to feel fully justified and even visionary in killing people to accomplish his "rational objectives."

D. A Comparative Analysis: Theodore Kaczynski's Essay and Letters and the UNABOM Manuscript

108. In addition to providing 86 personal letters received from Theodore Kaczynski during the preceding 30 years, David Kaczynski provided investigators with a photocopy of a carbon copy of an essay written by his brother in approximately 1971 (a copy of this essay and incorporated by reference to this affidavit in attachment number 3). In that essay his brother, Theodore Kaczynski, discusses the

necessity of forming and supporting an organization to bring about the end of Federal and corporate funding for scientific research. David Kaczynski has advised the UTF that his brother personally discussed with him in approximately 1971 the possibility of David heading up such an organization. David stated that he recognized substantial similarity between the ideas, concepts and expressions contained in his brother's 23 page essay and the UNABOM manuscript.

109. On March 23, 1996, Wanda Kaczynski, Theodore and David Kaczynski's mother, provided UTF members with a carbon copy of the essay bearing handwritten notations identified by David as Theodore Kaczynski's handwriting.

110. The affiant has consulted with and reviewed the findings of FBI Supervisory Special Agent James R. Fitzgerald, who has directed the comparative analysis of all of Theodore Kaczynski's correspondence and documentation in a side-by-side comparison of the UNABOM letters and 56 page manuscript entitled Industrial Society and Its Future. Through this study SSA Fitzgerald has informed the affiant that the content, context and writing style of Theodore Kaczynski's 6,374 word, 23-page, essay (attachment 3) and the 34,649 word UNABOM manuscript (attachment 2) are very similar. Some of those similarities are as follows:

111. One of the 47 paragraphs in the 1971 essay, 35 of the paragraphs can be correlated by subject matter with paragraphs in the UNABOM manuscript.

112. The comparative analysis provides over 160 examples of similarities including the following:

Theodore Kaczynski wrote in his 1971 essay (see attachment 3) regarding his objection to Perry London's view in his book Behavior Control, "I simply find the sphere of freedom that he favors too narrow for me to accept." The UNABOM manuscript states in paragraph 93, "We are going to argue that industrial-technological society cannot be reformed in such a way as to prevent it from progressively narrowing the sphere of human freedom ...." In paragraphs 111, 128 and 133, the UNABOM manuscript contains references to "... narrowing our sphere of ... freedom .... narrows our sphere of freedom ..... invades our sphere of freedom ...."

In Theodore Kaczynski's 1971 essay, he states: "Direct physical control of the emotions via electrodes and 'chemitrodes' inserted in the brain." Paragraph 158 of the UNABOM manuscript states: "It presumably would be impractical for all people to have electrodes inserted in their heads."

In Theodore Kaczynski's 1971 essay, he states: "Various electronic devices for surveillance. These are being used. For

example, according to newspaper reports, the police of New York City have recently instituted a system of 24 hour television surveillance over certain problem areas of the city." Paragraph 147 of the UNABOM manuscript states: "... there are the techniques of surveillance. Hidden videocameras are now used to collect and process vast amounts of information."

In Theodore Kaczynski's 1971 essay, he states: "... Think of all the misery suffered as a result of Victorian repressions, sexual perversions, frigidity, unwanted pregnancies, and venereal disease." Note two of the UNABOM manuscript reads: "During the Victorian period many oversocialized people suffered from serious psychological problems as a result of repressing or trying to repress their sexual feelings."

In Theodore Kaczynski's 1971 essay, he states: "Propaganda and image-making techniques. In this context we must not neglect the role of movies, television, literature, which commonly are regarded either as art or as entertainment, but which often consciously adopt certain points of view and thus serve as propaganda." Paragraph 73 of the UNABOM manuscript states: "...Propaganda is not limited to 'commercials' and advertisements...the content of entertainment programming is a powerful form of propaganda."

In Theodore Kaczynski's 1971 essay, he states: "... we can assume that people will live more and more in the world of mass entertainment." Paragraph 156 of the UNABOM manuscript states: "... yet mass entertainment is a means of escape and stress-reduction on which most of us have become dependent."

113. There are additional similarities between the writing of Theodore Kaczynski and documents related to the UNABOM events. In a handwritten and undated rough draft written by Theodore Kaczynski provided to the UTF by Wanda Kaczynski on March 23, 1996, Theodore Kaczynski states: "... Modern technology has led to the concentration of economic and political power ... by Big Business and Big Government." In note 13 of the UNABOM manuscript, the UNABOM subject states: "... The conservatives are ... exploiting his resentment of Big Government to promote the power of Big Business."

114. Other examples of similarities include the same uncommon (and in the last case inaccurate) spellings of words used in both categories of documents, such as "analyse" versus "analyze"; "wilfully" instead of "willfully"; licence instead of license and "instalment" rather than "installment."

115. A summary of similarities between documents associated

with Theodore Kaczynski and documents associated with UNABOM events is contained in attachment 4 to this affidavit. Attachment 4 was prepared by SSA Fitzgerald in this investigation.

116. Many letters written by Theodore Kaczynski to his brother David and mother Wanda discussed his wilderness lifestyle. These discussions of Theodore Kaczynski's lifestyle are consistent with the description of Theodore Kaczynski's lifestyle provided to the UTF by David and Wanda Kaczynski, as well as ___ These discussions of Theodore Kaczynski's lifestyle are also consistent with reference to the UNABOM manuscript.

117. The following are examples:

In a letter to David Kaczynski dated August 28, 1979, Theodore Kaczynski says: "....by wilderness I meant a place where our nearest neighbor would be 5 miles away..." In paragraph 55 the UNABOM manuscript says: "many nuclear families lived by choice in such isolation; having no neighbors within several miles.

In a letter to David dated November 17, 1982, Theodore Kaczynski says: "... partial destruction of the ozone layer in the atmosphere, which is caused by releases of fluorcarbons ..." and in a letter dated September 21, 1988, says: "They predict that in the coming years there will be increasing more drought ... because of the greenhouse effect." Paragraph 169 of the UNABOM manuscript says, "No one knows what will happen as a result of ozone depletion, the greenhouse effect and other environmental problems ..."

In a letter to ___ dated July 23, 1984, Theodore Kaczynski writes, "...primitive people...may have had some elaborate process for making edible, as with certain other plants." Theodore Kaczynski refers to the "edibility of the roots" in several letters. Paragraph 198 of the UNABOM manuscript says, "When primitive man needed food he knew how to find and prepare edible roots ...

In a letter to David dated August 21, 1981 Theodore Kaczynski writes, "... hunting and gathering wild fruits ... killing an animal for its meat." In paragraph 75 of the UNABOM manuscript, "... hunting not for sport ... but to get meat that is necessary for food."

E. Further Comparative Analysis Between UNABOM Manuscript and Theodore Kaczynski's Letters

118. The UNABOM manuscript (attachment 2) specifically refers by title to four books: The Ancient Engineers by L. Sprague DeCamp; Chinese Political Thought in the Twentieth Century, by Chester D. Tan; The True Believer, by Eric Hoffer; and Violence in America: Historical and Comparative

Perspectives, by Roger Lane and edited by Hugh Davies Graham and Ted Robert Gurr. In the UNABOM manuscript, Note 16 has quotes from Chapter 12, pages 476-478 of Violence In America. The UNABOM subject sent a letter and a copy of his manuscript to "Scientific American" on June 24, 1995. The UNABOM subject referenced an article in the August, 1993 issue of "Scientific American" by Russell Ruthen, entitled, "Strange Matters: Can Advanced Accelerators Initiate Runaway Reactions?", and a July, 1993 article entitled "Risk Analysis and Management," by M. Granger Morgon. The UNABOM manuscript made reference to articles in two magazines, "OMNI" and "Scientific American."

119. In a letter from Theodore Kaczynski to David Kaczynski dated September 2, 1986, Theodore Kaczynski makes reference to "L. Sprague DeCamp's The Ancient Engineers."

120. In an interview with the FBI on February 17-18, 1996, David Kaczynski advised that the Kaczynski family subscribed to "Scientific American" at least up until the time that he went to college. Moreover, "Scientific American" was around the house and readily available to family members. In Theodore Kaczynski's application for admission to Harvard College dated October 22, 1957, question "G" requests the applicant to cite examples of current reading, to include books, magazines and newspapers. Theodore Kaczynski cites "Scientific American" to answer this question. UTF investigators ___ several letters written to __ by Theodore Kaczynski. In one of the letters dated May 26, 1991, Theodore Kaczynski references an article entitled "Aspirin" in the January, 1991, issue of "Scientific American."

121. On March 24, 1996, Wanda Kaczynski, Theodore's mother, provided a letter authored by Theodore dated December 14, 1969, and addressed to the editor of the Chicago Daily News. Paragraph 2 of the letter began, "The stricter gun control laws recommended by the U.S. Commission on Violence are a case in point."

122. The affiant notes that in 1968, President Lyndon Johnson formed a commission to address the growing problem of violence in America. This commission, the National Commission on the Causes and Prevention of Violence, headed by Milton Eisenhower, tasked a group of scholars to research the history and causes of violence in America. One of the members of this Commission was Eric Hoffer. James Q. Wilson, a Harvard Professor, was on the Commission's Advisory Committee. The scholars produced a report, The History of Violence in America. Historical and Comparative Perspectives which entailed a thorough history of violence in the United States. This report was submitted to the Commission in 1969. Based on this report and others submitted by other groups working for the Commission, the

Commission issued a number of recommendations to include the initiation of some sort of Federal gun control. These recommendations were reported in the New York Times during the Summer, Fall and Winter of 1969. Theodore Kaczynski's reference to the U.S. Commission on Violence and stricter gun control suggests that he read The History of Violence in America Historical and Comparative Perspectives, another one of the four books referenced by the UNABOM subject in the UNABOM manuscript.

F. Analysis of UNABOM Letters by David Kaczynski

123. During the course of the UNABOM investigation, your affiant has reviewed various interviews of individuals who, for a variety of reasons, have suggested that the UNABOM manuscript was written by a friend, co-worker, or relative. Often the conclusion reached by those individuals was that, in their opinion, the writings of their friend, co-worker, or relative were similar to that of UNABOM manuscript.

124. David Kaczynski reviewed all of the writings attributed to the UNABOM subject. He came to the conclusion that based upon content, style, and specific phraseology of the writings that they were written by his brother, Theodore Kaczynski.

G. Scholarly Analysis of UNABOM Manuscript

125. Your affiant has reviewed the opinions expressed by a number of scholars and professional educators regarding their own evaluations of the UNABOM manuscript and associated UNABOM correspondence. None of these individuals had access to Theodore's Kaczynski's identity as a suspect nor to any of his writings. One individual (whose identity is known to the UTF) contacted the UTF and stated that he is familiar with The Technological Society, by Jacques Ellul, and that he believed the UNABOM subject has been influenced by this book that was popular in 1964. David Kaczynski advised investigators that around the 1971-72 period, the book by Jacques Ellul, The Technological Society, became his brother's "bible". In a letter from Theodore Kaczynski to his brother David, postmarked August 21, 1981, Theodore Kaczynski refers to Jacques Ellul and discusses Ellul's philosophy.

126. Another individual, who is a doctor and a holder of a PhD (whose identity is known to the UTF), contacted the UTF and opined that the UNABOM manuscript was authored by an individual that was very familiar with and even paraphrased ideas from two books, In Defense of Elitism by William A. Henry, III (1994) and Behavioral Control by Perry London (1969). Your affiant notes that Theodore Kaczynski cites Jacques Ellul's The Technological Society and Perry London's Behavioral Control beginning on page 10

of his 23-page essay (attachment 3), and devotes several pages to London's philosophy. Perry London, on page 128 of his book Behavioral Control refers by name to University of Michigan Professor James McConnell. Professor McConnell was injured by a UNABOM mail bomb that was mailed from Salt Lake City, Utah, on November 12, 1985.

H. Theodore Kaczynski and Professor James McConnell.

127. As previously stated, transcripts obtained confirm that Theodore Kaczynski pursued his Masters and Doctoral degrees at the University of Michigan, Ann Arbor, Michigan, earning a PhD in Mathematics in 1967. During the same period of time, Professor James McConnell was a Professor at the same University.

128. Theodore Kaczynski's Harvard transcripts indicate that he took a course entitled the "History of Science" while pursuing his Bachelor of Arts degree at Harvard. The UNABOM explosive device that was mailed to Professor McConnell on November 12, 1985, was accompanied by a letter purported to be from a Ralph C. Kloppenburg, Department of History, University of Utah, Salt Lake City, Utah. The letter served as an enticement to encourage Professor McConnell to open the package and review an unsolicited doctoral dissertation. The letter read, in part:

"Dear Dr. McConnell: I am a doctoral candidate in history at the University of Utah. My field of interest is the History of Science, and I am writing my dissertation on the development of the Behavioral Sciences during the 20th century ...."

129. In the 23-page essay attributed to Theodore Kaczynski (attachment 3), circa 1971, it states that "continued scientific and technical progress will inevitably result in the extinction of individual liberty" and lists as an "ominous" development "operant conditioning, (after the manner of B.F. Skinner and friends)." The essay ends by proposing the foundation of an organization dedicated to stopping federal and corporate aid to scientific research.

130. In the second paragraph of the UNABOM letter from "Kloppenburg" to Professor McConnell, the writer states in part,

"... I am attempting to analyse the factors in society at large that tend to promote vigorous development in a given area of science, and especially I am attempting to shed light on the way in which progress in a particular field of research influences public attitudes toward that field in such a manner as to further accelerate its development, as through research grants ..."

131. Professor McConnell's behavior modification techniques were documented in scientific literature and involved

"operant conditioning". His findings were widely publicized in digests and journals, as well as a Psychology textbook, Understanding Human Behavior, which, according to the publisher, became one of the top five best selling textbooks in its field. Professor McConnell received research grants from the National Institute of Mental Health (a Federal Agency) for his work in this field.

I. David Kaczynski's Chronology of Theodore Kaczynski

132. During interviews with UTF members, David Kaczynski provided a review of Theodore Kaczynski's whereabouts and activities from 1967 to the present, to the extent that he was knowledgeable. David said that after graduating from the University of Michigan, his brother announced he had obtained a teaching position at the University of California, Berkeley (UCB). As previously stated, Theodore Kaczynski was an Assistant Professor in the UCB Department of Mathematics from July 16, 1967, through June 30, 1969, and lived in Berkeley, California. While at Berkeley, Theodore Kaczynski spent time in the woods in Northern California, took up deer hunting and purchased a rifle.

133. UTF investigation has verified that Theodore Kaczynski was an Assistant Professor of Mathematics at the University of California - Berkeley (UCB), as confirmed in the UCB General Catalogue, 1968- 69. The Department of Mathematics was located in Campbell Hall. Campbell Hall is located in close proximity to Cory Hall, which was the site of placed UNABOM devices on July 2, 1982 and May 13, 1985.

134. In an interview with the UTF on February 18, 1996, David Kaczynski recalled that shortly after departing UCB, his brother had played a practical joke involving a forged letter. Theodore Kaczynski sent a letter to one professor at UCB, purportedly from another professor. David Kaczynski was quite impressed with the content and manner in which the letter was drafted. Dave could not explain this peculiar behavior, other than to say that Ted did not have any friends of his own to write to during that period.

135. David Kaczynski recalled that, in June, 1969, Theodore Kaczynski quit his job at UCB. Shortly thereafter, David met his brother in Wyoming and they travelled in Theodore Kaczynski's car to British Columbia, Canada to find some land. Theodore Kaczynski found some land near Prince George and filed homesteading-type applications for the land. Theodore Kaczynski returned to his family's home in Lombard, Illinois, in the summer of 1969, where he lived while awaiting word from the Canadian government on his land application.

136. During the winter of 1970, Theodore Kaczynski received a letter from the Canadian government rejecting his

application. Theodore Kaczynski remained at his parent's home, but did not work. He became very anti-social and withdrawn, and stayed in his room reading. It was at this time that Theodore Kaczynski began writing letters to editors concerning technology and liberty.

137. In July or August, 1970, David received a letter from his parents, who shared the content of a note received from his brother. The note said that their parents were the best parents anyone could have, and he was sorry if he disappointed them.

138. Shortly thereafter, Theodore Kaczynski showed up at David's apartment in Great Falls, Montana. Theodore Kaczynski told David about conflict with their parents and said he had to get away. Theodore Kaczynski wanted to know if David wanted to join him and become 50-50 partners on a land purchase, to which David agreed. Theodore Kaczynski found 1.4 acres near Lincoln, Montana, for $2,100. Theodore and David Kaczynski each contributed $1,050 to purchase the land. Theodore Kaczynski thereafter purchased lumber and supplies and, without any help, built a small cabin on the site.

139. Wanda Kaczynski provided the UTF with copies of letters Theodore Kaczynski wrote in 1969 and 1970 to editors of Chicago newspapers and various magazine concerning technology and liberty. Wanda also provided a copy of an undated letter from Theodore Kaczynski that said "no one could want better parents."

140. According to David, Theodore Kaczynski stayed at his Lincoln, Montana, cabin until late 1972 or 1973, when he travelled to Salt Lake City, Utah to find a job. According to David, Theodore Kaczynski spent about six months in Salt Lake City, working as an unskilled carpenter's helper for a private contractor. David visited overnight with his brother at an apartment in Salt Lake City during David's trip from Chicago to Great Falls, Montana. David Kaczynski recalled that Theodore Kaczynski thereafter returned to Montana in June, 1973.

141. In the winter of 1974, Theodore Kaczynski wrote the family a letter to say that he would be away camping for a while and that they should not worry if they did not hear from him.

J. Comparison of Theodore Kaczynski's known whereabouts with UNABOM Device Dates

142. The UTF has evaluated information provided during the interviews of David and Wanda Kaczynski, and compared Theodore Kaczynski's whereabouts with the dates of the following UNABOM events:

143. UNABOM Device #1 was found at the University of Illinois, Chicago Circle Campus on May 25, 1978. Theodore

Kaczynski began a job with Foam Cutting Engineers in Chicago on June 26, 1978. David believed that his brother returned to Chicago from Montana a few days, to no more than 30 days, before starting this job. According to David, when Theodore Kaczynski returned, he took a Greyhound bus from Montana to the main bus terminal in Chicago.

144. UNABOM Device #2 was placed at Northwestern University on May 9, 1979. According to David, Theodore Kaczynski was working in Chicago on May 9, 1979.

145. UNABOM Device #3 was mailed from the Chicago area on November 14, 1979. David recalled that Theodore Kaczynski had gone to work at Prince Castle Restaurant Equipment Division in August or September, 1978, and then quit in the summer of 1979. Theodore Kaczynski stayed at his parent's home for awhile and then borrowed David's car, thereafter travelling to Canada for 6- 8 weeks, to look for land in Saskatchewan. Theodore Kaczynski returned to Chicago and later to Montana that summer or fall. Wanda Kaczynski believed that her son remained in Lombard until the fall of 1979 before returning to Montana. She remembered walking with him to the local commuter train in Lombard.

146. UNABOM Device #4 was mailed from the Chicago area on June 3, 1980 to Percy Wood, then President of United Airlines. UTF investigation has determined that in a letter to David from Theodore Kaczynski, dated August 21, 1981, translated from Spanish to English, Theodore Kaczynski writes, "Last year I was absent for a large part of the summer." The UTF has documented Theodore Kaczynski's stay at the Park Hotel, Helena, Montana, on April 14- 18, 1980, May 12-14, 1980 and August 13-15, 1980. This would have allowed an opportunity for Theodore Kaczynski to travel to Chicago during his absence from Montana.

147. UNABOM Device #5 was placed at the University of Utah on October 8, 1981. Theodore Kaczynski was living in Montana during this time frame. Theodore Kaczynski stayed at the Park Hotel in Helena, Montana on November 9-10, 1981, which was within a month of the placement of Device #5.

148. UNABOM Device #6 was mailed from Provo, Utah on April 23, 1982. Theodore Kaczynski was living in Montana during this time frame and stayed at the Park Hotel in Helena on May 12- 3, 1982, within a month of the mailing of Device #6.

149. There were four UNABOM Devices during 1985, the UNABOM Subject's most active year. UNABOM Device #9 was mailed from Oakland, California on May 8, 1985. UNABOM Device #8 was found at Cory Hall, University of

California, Berkeley on May 15, 1985, but witnesses reported first observing it several days earlier. UNABOM Device #10 was mailed from Salt Lake City on November 12, 1985. UNABOM Device #11 was placed outside Rentech Computer Rental, Sacramento, California on December 11, 1985.

150. From a review of Theodore Kaczynski's letters mailed to his brother and furnished to the UTF, it was determined that Theodore Kaczynski had planned to visit David at David's cabin in Alpine, Texas in 1985. By letter dated February 10, 1986, he canceled the trip stating, "Well, I can't come to see you after all. I am extremely sorry to inconvenience you with all these changes of plans. All I can say is that these changes of mind are not frivolous and arbitrary - they are due to changes of circumstances. There is more to this than you realize."

151. In a March 8, 1996, ____ Kaczynski said he had gone to either California, Arizona or Utah to look for a job. ___ remembered it was a warm weather state, one of the three states he mentioned.

152. During September or October, 1986, David visited his brother at his cabin in Montana. Prior to the visit, Theodore Kaczynski sent David a letter postmarked September 2, 1986, which said:

"Dave-you can come between Sept. 27 and Oct. 4 inclusive, but not outside those dates."

153. David stated that he did see his brother at this time, but also stated that he has not seen his brother since the 1986 visit to Montana.

154. UNABOM Device #12 was placed at the outside rear of CAAMS Computer Store in Salt Lake City on February 20, 1987. ___ device as a white male, approximately 25-30 years old, 5'10" to 6' in height, 165 pounds, lean, wiry build, with a reddish, rough looking complexion and strawberry blond hair and light mustache.

155. Theodore Kaczynski is described as a white male, 5'9" 150 pounds with a lean, wiry, appearance, and dark colored hair. Two photographs of Theodore Kaczynski are being submitted with this affidavit. Attachment 5 is a photograph purportedly depicting Theodore Kaczynski taken during his years at UCB. This photograph was obtained from a faculty member at UCB. Attachment 6 is a 1991 Montana Drivers License photograph of Theodore Kaczynski.

156. In 1989 David wrote Theodore Kaczynski indicating that he, David, planned to live with his future wife, Linda. Theodore Kaczynski responded with anger. He told David he did not want to communicate with him again. He also told David to write to him only if he had something really

important to say, and to do so by placing a red line on the envelope beneath the stamp, signifying the importance of the contents. Theodore Kaczynski said that he intended to destroy any envelopes that did not have a red line.

157. David also sent his brother a letter requesting that he be the best man at David's July, 1990 wedding, but Theodore Kaczynski did not respond.

158. In September, 1990, David sent his brother a letter advising him that their father was very ill. Theodore Kaczynski responded and stated that this had been an appropriate use of the red line. Their father died on October 2, 1990, and David wrote Theodore Kaczynski to advise him of the memorial service. Theodore Kaczynski did not attend the service.

159. In January or February, 1991, Theodore Kaczynski wrote to David asking for his share of the father's estate, which was approximately $60,000. Theodore Kaczynski did not receive this money, but did get $7,000 from his mother under separate circumstances.

160. In the summer of 1991, Theodore Kaczynski wrote David saying he did not want anything further to do with the family.

161. In November, 1994, Theodore Kaczynski wrote David asking for a $1,000 loan, followed by another request for a $2,000 loan. David sent the money to his brother in the form of cashier's checks.

162. In November, 1995, David wrote a letter to his brother stating his concern for Theodore Kaczynski's welfare and suggesting a visit to Montana. Theodore Kaczynski responded by a letter postmarked November 30, 1995 in which he rejected the idea of a visit, and told David he should not write except for practical matters related to the property.

K. Further Analysis of Theodore Kaczynski's Activities and UNABOM Incidents

163. The UTF has undertaken an extensive investigation of Theodore Kaczynski's known activities, with the objective of accounting for his whereabouts and location on specific dates between May 25, 1978, the date of the first UNABOM event, and June 24, 1995, the date of the mailing of the UNABOM manuscripts from San Francisco, California. In connection with this investigation, the UTF has reviewed the following materials:

164. ___

165. Interviews and documents from a hotel in Helena, Montana ___ , where Theodore Kaczynski stayed overnight

on 31 occasions between April 14, 1980 and October 4, 1995;

166. Interviews and documents from a bank in Missoula, Montana (Western Federal Savings) where Theodore Kaczynski had two checking accounts and two Certificates of Deposit (CD) accounts. On May 15, 1984, Theodore Kaczynski obtained two Certificates of Deposit, for $500 each. CD account #207 was closed on September 26, 1984. CD account #208 was closed on August 20, 1985. On May 22, 1985 Ted opened checking account #110093923 with a $600 check and $51.17 he received on interest from CD #207. This checking account was closed on July 13, 1994: Theodore Kaczynski wrote approximately 400 checks on this account between May 22, 1985 and July 13, 1994. There were no deposits to the account from 1991 until the account was closed on July 13, 1994. The second account reflects the writing of 32 checks between February 21, 1995 and August 23, 1995, when the account was closed with a cash withdrawal of 5203.53 in Missoula, Montana;

167. A total of approximately 100 letters written by Theodore Kaczynski to his brother, David, or mother, Wanda, with verifiable postmarks. Based on this review, with the exception of a deposit posted to one of the bank accounts on December 11, 1985, none of the postmarks, checks, hotel stays, or visits to the doctor are in conflict with dates of UNABOM incidents. The December 11, 1985 date corresponds to the placement of a bomb at Rentech in Sacramento, California.- UTF has been unable to determine as yet, whether this posting date accurately indicates that Theodore Kaczynski personally made a deposit on that day.

168. Recent investigation has determined that public bus transportation exists which would enable an individual to travel from Lincoln, Montana to San Francisco or Oakland, California, and return. RimRock Trailways buses depart once per day from Lincoln to both Missoula and Great Falls, Montana. From either of those cities, bus service is available to Helena, Montana, or, from Missoula, to Butte, Montana. RimRock Trailways buses depart southbound daily from Helena, Montana, beginning at 9:00 a.m. They travel south through Butte to Idaho Falls, Idaho, where connection is made with Greyhound Lines. From Idaho Falls, Greyhound proceeds to Salt Lake City, Utah, with connections available to the San Francisco Bay Area via Reno, Nevada and Sacramento, California.

169. Such travel from Helena takes an average of 25.5 hours to Sacramento, 28 hours to Oakland and 28.5 hours to San Francisco. Return trips take the same amount of time and can be started several times per day. It is also possible to travel from Missoula, Montana to Butte, Montana on Greyhound Lines (and then on to Idaho Falls) but that takes several hours longer than to starting from Helena.

170. ___ photograph of Theodore Kaczynski as that of a person has had as a passenger between Lincoln and Missoula "three or four times" within the past year.

171. ___ identified a photograph of Theodore Kaczynski as that of a person had as a passenger between Lincoln and Missoula "four or five times" within the past year.

172. ___ identified a photograph of Theodore Kaczynski as a person __ has had as a passenger on the bus route between Idaho Falls, Idaho and Great Falls, Montana (passing through Helena) a number of times since __ began working for RimRock in September, 1994. __ pacifically recalled seeing Kaczynski at the bus driver switch point in Butte "at least three or four times."

173. ___ UTF investigators interviewed ___ stated __ was familiar with Theodore Kaczynski and that ___ stated that Kaczynski "hops on a bus and goes and visits a lot more than anyone thought." __ recalled Kaczynski telling _ these bus trips. __ about two or three years ago, Kaczynski was very excited about taking a trip "back home __ that in the last two to three years, Kaczynski has gone back to the Chicago or Detroit area on a couple of occasions. __ stated Kaczynski went "down" to see his Mexican friend at least once in the past two to three years. __ this Mexican friend's situation really bothered Kaczynski. __ believes Kaczynski- visited this friend in either California or Colorado.

L. Money Received by Theodore Kaczynski from David and Wanda Kaczynski:

174. UTF investigation has identified two bank account __ Montana, maintained by Theodore Kaczynski from 1984 to 1994 and February 21, 1995 through August 23, 1995. A third bank account in __ Montana belonging to Theodore Kaczynski has also been identified __

175. A review of Wanda Kaczynski's canceled checks and David Kaczynski's records reflect the following funds sent to and/or deposited by Theodore Kaczynski, on the following approximate dates. The designation of a question mark indicates the UTF's inability to determine the specific date reflected on the document.

CHECK DATE......... DATE POSTED............ AMOUNT

5/16/85.............. 5/2?/85............. $600.00

12/5/85.............. 12/28/85.............$600.00

12/27/85..............1/8/85.............. $25.00

5/15/86.............. 5/25/86............. $600.00

7/1/867/...............12/86.............. $20.00

11/22/86..............12/4/86............. $20.00

12/10/86..............12/31/86.............$620.00

5/10/87.............. 5/27/87............. $600.00

11/13/87..............12/3/87............. $15.00

5/15/88.............. 5/21/88............. $600.00

11/15/88..............11/23/88.............$10.00

5/15/89.............. 5/31/91............. $750.00

11/16/89.............. 12/4/89............ $10.00

12/10/89..............12/29/89.............$750.00

5/18/90.............. 5/31/90............. $750.00

12/10/90..............12/27/90.............$800.00

7/26/91.............. 7/30/91............. $7,032.81

11/94

(received from David)...................... $1,000.00

2/1/95

(received from David).......................$2,000.00

TOTAL (5/16/85 - 2/1/95)....................$16,802.81

176. As previously stated-herein, UTF has obtained documents pertaining to a deposit on a bank account maintained by Theodore Kaczynski on December 11, 1985.

177. Of significance with respect to the above dates between 5/16/85 - 2/1/95, Theodore Kaczynski received $16,802.81, but his bank records indicate deposits of a lesser amount.

178. Theodore Kaczynski opened the first account __ May 22, 1985, with the $600 check received from Wanda, dated May 16, 1985. The UNABOM subject was in the San Francisco Bay Area sometime between May 8, 1985 and May 15, 1985, UNABOM Device #8 was mailed to Boeing on May 8, 1985 and Device #9 was observed in Room 264 of Cory Hall, UCB, several days prior to the May 15, 1985 detonation.

179. Theodore Kaczynski deposited the $600 check dated December 5, 1985 from his mother on December 28, 1995, and the $25.00 check, dated December 27, 1985, from his mother on January 8, 1986. UNABOM Device #11 was

placed at Rentech Computer Rental, Sacramento, California on December 11, 1985, requiring the presence of the UNABOM subject in Sacramento.

180. Suspect received $1,000 from David circa November 14, 1994, approximately one month prior to UNABOM Event #15, mailed to Thomas Mosser from San Francisco, California, on Saturday, December 3, 1994.

181. Suspect received $2,000 from David circa January 19, 1995 and prior to the mailing of UNABOM Device #16 to Gilbert Murray from Oakland on April 20, 1995 and the mailing of the UNABOM manuscript from San Francisco on June 24, 1995.

182. It should be noted that Theodore Kaczynski sent David a letter postmarked November 2, 1994, requesting $1,000.

183. By letter postmarked December 23, 1994, Theodore Kaczynski requested the additional $2,000, stating "I need another $2,000 ... if and when I get over present difficulties sufficiently ... There won't be any further requests for loans ... if another $2,000 won't do it, then I guess nothing will, so I may as well give up."

M. Further Analysis of Characteristics Between the UNABOM Subject and Theodore Kaczynski:

184. UTF investigators have reviewed over 100 letters written by Theodore Kaczynski to his mother, brother and Dr. Goren, wherein Theodore Kaczynski discusses his feelings of anger. Likewise, the UNABOM subject expresses anger and frustration with modern society because of its dependence on modern technology. This anger is reflected in the UNABOM manuscript.

185. In an undated letter to David from Theodore Kaczynski, he wrote:

"As you know, I have no respect for law or morality. Why I never committed any crime? (of course, I'm not talking about something like shooting a grouse out of season now and then. I mean felony type stuff - burglary, arson, murder, etc.) Lack of motive? Hardly. As you know, I have a good deal of anger in me and there are lots of people I'd like to hurt. Risk? In some cases, yes. But there are other cases in which I can figure out ways of doing naughty things so that the risk would be insignificant. I am forced to the humiliating confession that the reason I've never committed any crime is that I have been successfully brainwashed by society. On an intellectual level I have only contempt for authority, but on an animal level I have all too much respect for it. My training has been quite successful in this regard and the strength of my conditioned inhibitions is such that I don't believe I could ever commit a serious crime. Knowing my attitude toward

psychological manipulation of the individual by society, you can imagine how humiliating it is for me to admit to myself that I have been successfully manipulated."

N. Additional Findings by the UNABOM Task Force

186. UTF investigations have obtained a copy of Theodore Kaczynski's Harvard transcripts and other material from Harvard. In the Theodore Kaczynski's Harvard file in a letter from his mother, dated July 16, 1958, which states:

"Much of his time is spent at home reading and contriving numerous gadgets made up of wood, string, wire, tape, lenses, gears, wheels, etc.; that test out various principals in physics. His table and desk are always a mess of test tubes, chemicals, batteries, ground coal, etc. He will miss greatly, I think, this browsing and puttering in his messy makeshift lab."

187. On March 23, 1996, Wanda T. Kaczynski, Theodore Kaczynski's mother, was interviewed by Special Agents of the FBI concerning her son. Mrs. Kaczynski provided the agents with ninety items which included: (1) further letters written by her son Ted, (2) several essays written by her son, (3) essays that she had written, (4) copies of checks made payable to her son from May, 1985 through July, 1991, and (5) a handmade cylindrical wooden box containing a handwritten letter from Theodore Kaczynski.

188. Among the letters was a handwritten letter to his mother where Theodore Kaczynski asks her to mail a fourth "manuscript" entitled "Three Worthy Artisans", to the magazine editors of Harper's Weekly. Also included in those documents obtained from Wanda Kaczynski was a typed article entitled, "How I Blew Up __ by "Apias Tuberosa, Pseudym [sic] for T.J. Kaczynski, 463 N. Ridge, Lombard, Illinois 60148." Your affiant notes that the UNABOM subject has used several pseudonyms in connection with his devices and mailings.

189. In the __ article, Theodore Kaczynski describes how a high school classmate blew up a mixture of chemicals provided to him by Theodore Kaczynski. He writes in the article:

"When I was in high school I took a course in chemistry. There was only one aspect of the subject which interested me, as any chemist could have seen from a brief inspection of my rather specialized home collection of reagents; (sic) powdered aluminum, powdered magnesium, powdered zinc, sulfur, potassium, nitrate, potassium permanganate...in suitable combinations these things are capable of exploding." "One day in the laboratory, having finished my assigned experiment early, I though I might as well spend the extra

time pursuing my favorite line of research. On theoretical grounds, a mixture of red phosphorus and potassium chlorate seemed promising. (I did not know at the time that it is the red phosphorus in the scratching surface of a match-book, together with the potassium chlorate in the match-head, that makes a match light so readily. I later found that the mixture is extremely sensitive to friction and practically impossible to work with. The reader is advised not to play with it."

190. An analysis of-the elements found in the first six UNABOM devices indicates that they contained powdered aluminum, potassium chlorate, and match-heads, which were included the specific references made by Theodore Kaczynski in his essay above.

191. The UTF has obtained copies of letters sent to __ These letters include requests for various types of psychological, scientific, and historical magazines and books.

192. Your affiant has reviewed a letter of April, 1991, signed by Theodore Kaczynski and sent to __ in that letter, Theodore Kaczynski describe __ that he had been "under strong stress" since the "age of 38." He also wrote the reasons for the stress" are personal and I do not intend to discuss them. For the least four or five years I've been under more stress than previously."

193. A Sylvan Learning Center was opened in Helena, Montana in 1994, one of three such centers in the entire state of Montana. Helena, Montana is approximately 60 miles from Theodore Kaczynski's home. The Sylvan Learning Center is a business whose primary focus is increasing the educational skills of high school students, with a particular emphasis on English and Mathematical subjects.

194. In the UNABOM Manuscript (Attachment 2) specific reference is made to the Sylvan Learning Center. This is the only business mentioned specifically, by name, in the UNABOM manuscript.

195. During her March 23, 1996 interview, Wanda Kaczynski advised that she read articles about the "Unabomer" in the newspaper which described the "Unabomer" as a loner who is against technology. She noted that the description fit her son, Ted, and she said, "people like my son Ted are vulnerable to suspicion. He likes to live alone, likes privacy, is an environmentalist, and he deplores the excesses of technology." Although she did not believe that Ted is the "Unabomer," she was upset because his lifestyle would lead the authorities to suspect him, and it would be unfair. She also said, "but if it is him, he must be stopped."

196. She stated that she and her deceased husband had visited Theodore Kaczynski at his Montana residence until the mid-

1980's. She recalled Theodore Kaczynski completing a lot of work to his property including the construction of a root cellar. She claimed that the root cellar was visible from the front door of her son's cabin and located across a creek some 100 to 150 feet from the cabin. She described it as an enclosure in the side of a hill, covered with sod, and some type of door covering it.

197. Wanda recalled that she had purchased a portable manual typewriter as a gift for Theodore Kaczynski in 1984 or 1985. She explained that it was either transported or shipped to her son in Montana.Mrs. Kaczynski said that the family had a manual and electric typewriter at their family home in Lombard, Illinois in the late 1970's. She said that Theodore Kaczynski would have access to either of those typewriters.

198. It is noted by your affiant that numerous comparative samples were obtained from typewritten letters attributed to Theodore Kaczynski or members of his family. To date, forensic analysis indicates that those typewritten samples do not match the typewritten documents connected to the Unabom events.

199. In paragraph 185 of the UNABOM Manuscript (Attachment 2), it is stated "...well, you can't eat your cake and have it too." In a letter signed by Theodore Kaczynski, to his mother Wanda Kaczynski, date unknown, Theodore Kaczynski compares "... the increase in the complexity of our social organization that actually make necessary the erosion of privacy and freedom. We will be sacrificing some of the materialistic benefits of technology, but there just isn't any other way. We can't eat our cake and have it too."

200. It is noted by your affiant that the common use English Language phrase is, "You can't have your cake and eat it too!"

201. Handwritten samples of the UNABOM subject have been obtained for possible forensic comparison. The FBI Laboratory has concluded that there are insufficient samples by which a comparison could be made to the handwritten letters of Theodore Kaczynski.

202. A number of stamps have been obtained from devices mailed or placed by the UNABOM subject. A number of stamps have been obtained from the letters mailed and written by Theodore Kaczynski. According to the FBI Laboratory there is no forensic correlation between those samples.

203. Latent fingerprints attributable to devices mailed and/or placed by the UNABOM subject were compared to those found on the letters attributed to Theodore Kaczynski. According to the FBI Laboratory, no forensic correlation exists between those samples.

204. Your affiant is aware that other individuals have conducted analyses of the UNABOM Manuscript __ determined that the Manuscript was written by another individual, not Theodore Kaczynski, who had also been a suspect in the investigation.

205. Numerous other opinions from experts have been provided as to the identity of the UNABOM subject. None of those opinions named Theodore Kaczynski as a possible author.

V

OTHER SUSPECTS

206. During this investigation the UTF agents have looked at a number of individuals as potential suspects. These investigations resulted either from tips provided by the public, leads given by other law enforcement officials, or analysis of data obtained from several sources. (As an example of the data analysis, the UTF obtain lists of individuals who attended certain schools during specific time periods. The agents then identified those individuals who were at a combination of the schools at the times that devices were either placed or sent there.) However, after further investigation, additional evidence was developed as to these individuals that indicated that the person should no longer be considered a priority suspect. (While we have not included all of the details of those individual investigations in this affidavit, it is available for the Court's review should the Court so desire.)

VI

REGISTRATION CHECK

207. On February 28, 1996, Special Agent Joyce L. Seymour, BATF, caused a check of the Bureau of Alcohol, Tobacco and Firearms Explosives Licensing Section located in Atlanta, Georgia to determine if Theodore John Kaczynski, date of birth May 22, 1942, has been issued a federal license to manufacture explosives. The results of said check indicate that Theodore John Kaczynski, date of birth May 22, 1942, had not been licensed to manufacture explosives as defined in Title 18 United States Code, Chapter 842.

208. On February 28, 1996, Special Agent Joyce L. Seymour caused a check of the Bureau of Alcohol, Tobacco and Firearms National Firearms Registration and Transfer Records in Washington, D.C. to determine if Theodore John Kaczynski, date of birth May 22, 1942, had any destructive devices registered to him. The results of said check indicate that there were in fact no firearm or destructive devices registered to Theodore John Kaczynski, date of birth May 22,

1942.

VII

REQUEST FOR AUTHORIZATION TO EXECUTE WARRANT AT ANYTIME, DAY OR NIGHT

209. As outlined above, Theodore John Kaczynski has been able to avoid identification for almost twenty years. In the June 24, 1995 letter to Professor Thomas Tyler of the University of California at Berkeley, the UNABOM subject apologized for sending carbon copies of his manuscript. He advised that he could not photocopy the manuscript for fear of fingerprint detection.

210. In order to assure, to the extent possible, the safety of the public and the agents, surveillance will be conducted on the premises and on Theodore John Kaczynski for a period prior to the execution of the warrant. In the event that Theodore John Kaczynski suspects that he is being surveilled, he may attempt to obtain an explosive device or destroy evidence. Because of the potential for extreme danger in executing a warrant at such a premises, it is requested that the agents be authorized to commence the search as the situation dictates at anytime, day or night.

VIII

PROLONGED EXECUTION

211. It is expected that the execution may take an unusually long time. The explosive devices that Theodore John Kaczynski has manufactured in the past have been extremely dangerous and easily detonated. It is the opinion of SSA Mohnal that Theodore John Kaczynski has manufactured more than one device at a time. Further, in the April 24, 1995 letter to Warren Hoge of the New York Times, the Unabom subject stated that he had spent a considerable amount of time testing various devices. As a result of all this information, it is believed that Theodore John Kaczynski may have fully operational explosive devices on the premises. The executing agents will first have to assure themselves that Theodore Kaczynski has not set explosive "boobytraps" aimed at destroying evidence and killing agents. The initial search for such devices may take hours and even longer if explosives are found.

212. It is anticipated, that once the premises are secure, experts in various laboratory techniques, who will have been flow in from around the country, will conduct the evidence search and perform tests on various items even before they are moved. It is expected that this process could take more than a day. It is therefore requested that the executing and searching agents be given permission to secure and leave the premises for periods of rest and be able to return to continue

the search. During their absence, agents will maintain security of the premises to assure that no unauthorized persons enter. In no event will this extended search take longer than 7 days (168 hours) without additional authorization of the court.

IX

ITEMS TO BE SEIZED

213. Based on all of the information contained in this affidavit, which establishes a continual and consistent pattern of conduct between 1978 and the present date, and based on the expert opinion of Supervisory Special Agent of the FBI's Explosive Unit, who has stated that probable cause exists that all of the below-listed items would be utilized in the manufacture, construction, assembly, packaging, and mailing of the explosive devices, your Affiant believes that probable cause exists that the following items, which are evidence of said violations, and are the fruits and instrumentalities of the foregoing crimes, are currently being stored at the premises of Theodore John Kaczynski, located in Lewis and Clark County, in the State of Montana, more particularly described in the Application and Affidavit for Search Warrant and Attachment A, previously incorporated by reference.

214. Tools and other instruments or items which have been used, can be used, or are intended to be used in the manufacture and/or construction of improvised explosive devices or the components thereof. These items include, but are not limited to, saws, files, metal punches, drill bits, sanding devices, hammers, chisels, drills, vice or similar jawed tools, abrading equipment, soldering and brazing equipment, wire strippers, screwdrivers, staplers, safety wire and other pliers, various hand tools for cutting steel bar stock, grinders, sandpaper, leather working tools, pots or other containers used to melt lead and aluminum, tools and associated materials used in the casting of lead and aluminum, machines and tools which cut metal pipe, tools used for cross-referencing circumference to diameter, rulers and other various measuring devices, abrasive cloths, steel wool or iron wire.

215. The following explosives, chemicals or other substances which have been used, can be used or are intended to be used in the manufacture or construction of improvised explosive devices, or the components thereof: These items include but are not limited to, firearms ammunition, smokeless powder, black powder, aluminum and aluminum powder, gasoline containers, barium nitrate, magnesium, potassium chlorate, potassium perchlorate, sulfur, potassium sulfate, ammonium nitrate, sodium chlorate, matches, or other pyrotechnic mixtures and constituents.

216. The following items, which have been used, can be used or are intended to be used to house or contain improvised explosive devices and the components thereof: These items include, but are not limited to, cigar boxes, wood, wooden boxes, wooden blocks, scrap wood and wood sources such as boxes, pallets, cabinets and crates, hollowed-out books, the book entitled the "Ice Brothers" by author Sloan Wilson, or portions thereof, notebooks, loose leaf binders, or other plastic containers.

217. The following items and materials which have been used, can be used or are intended to be used as component parts of improvised explosive devices: These items include, but are not limited to, metal tubes/pipes, cans, switches, barometers, springs, batteries, dowels, plugs, screws, pins, nuts and bolts, nails, staples, fishing line, straps, washers and brackets, rubber bands, cord, wire, flashlight bulbs, alligator clips, and lead split shot, tire weights or similar item, any form of aluminum metal or scraps, sheet metal scraps and shims.

218. The following items which have been used, can be used or are intended to be used in the construction or assembly of improvised destructive devices: These items include, but are not limited to, solder, epoxy, glues and other adhesives or caulking materials, varnish, lacquer, paint, wax and wax paper, lead, solid silver bar, metal debris, explosive residue and debris, gloves, plumbing sink traps, tape, gasket material and twine.

219. The following items which have been used, can be used or are intended to be used as exterior packaging materials: These items include, but are not limited to, boxes, envelopes, mailing labels, rubber stamps, rubber stamp kits, postage stamps, wrapping paper, padded envelopes, stenciling sets, ink pens, ink pads, and scales.

220. Typewriters.

221. Any and all documents, photographs, papers, written materials, books, diagrams, schematic drawings, video tapes, computer generated or stored information or other materials which relate to the manufacture, construction and/or assembly of improvised explosive devices or any of the components thereof.

222. Any and all receipts, invoices, purchase orders, sales slips or other documents and materials relating to the purchase or procurement of any and all materials and tools which have been used, can be used, or intended to be used in the design, manufacture and construction of improvised explosive devices; said documents would include, but are not be limited to, those which denote the purchase or obtainment of any or all items previously listed in paragraphs A through H.

223. Any and all documents, photographs, papers, written or printed materials, books, video tapes, computer generated or stored information or other materials and indicia which relate to the names of, "Wu", the initials "R.V." and "FC", "The Ice Brothers" a book written by Sloan Wilson, "The History of Violence in America," a book written by Hugh Graham and Ted Gurr, "Chinese Political Thought in The 20th Century", a book by Chester C. Tan, "The Ancient Engineers", a book by L. Sprague de Camp, "The True Believer" by Eric Hoffer, Ralph C. Kloppenburg, Enoch W. Fischer, or any of the previously identified persons, names, mailing addresses, or bombing incidents which appear in this affidavit. These items will also include any lists of previous or future targeted individuals or victims.

224. Any and all documents or computer generated and stored information, including but not limited to, appointment books, diaries, journals, calendars, telephone toll records, receipts, bank statements, credit card statements, motel receipts, canceled checks, travel itineraries, canceled airline tickets, car rental contracts or other receipts which denote Theodore Kaczynski's travel and whereabouts between 1978 and the present date.

225. Any and all documents, materials, and correspondence relating to Theodore Kaczynski's affiliation or association with educational institutions and universities, airlines, airline fabrication plants, scientific and professional groups or organizations, and computer companies.

226. Any and all literature, documents, materials, books, correspondence, membership lists, written materials, or computer generated and stored lists which relate to the identity of any co- conspirators who may be involved in any of the aforementioned bombing incidents.

227. Any and all literature, documents, materials, books, correspondence, or computer generated and stored information relating to or showing an interest in or affiliation with any movement or group advocating violence, revolution or anarchy.

228. Any and all documents and other indicia of any kind showing ownership or control of the premises described in Attachment A or under the control of Theodore Kaczynski, including but not limited to, rental agreements, contracts of sale, deeds, leases, utility and telephone bills, keys.

229. Any and all documents and other indicia of any kind showing ownership or control of storage facilities, safe deposit boxes, other commercial or rental properties, rented or owned by Theodore Kaczynski, which could be used for the storage of the above- mentioned items, including but limited to rental agreements, leases, contracts, deeds, keys

and access devices.

230. Based upon the facts presented herewith, your affiant has reason to believe that there is probable cause to search the premises belonging to, owned by, and/or under the control of, Theodore John Kaczynski, and therefore request that a warrant be issued authorizing a search for the aforementioned items of evidence related to the violations mentioned herein.

/s/
Terry D. Turchie
Assistant Special Agent in Charge
Federal Bureau of Investigation

SWORN AND SUBSCRIBED TO BEFORE ME THIS 3RD DAY OF APRIL, 1996

/s/
United States District Judge

United States District Court
District of Montana

ENDNOTE

1. The original examination was conducted by Bureau of Alcohol Tobacco and Firearms (ATF). Their report indicated that the device was a hoax. Subsequent examination by the FBI and Postal Labs made in connection with the other devices have resulted in a different opinion. In the April 20, 1995, letter to the New York Times the Unabomber noted that it "was a botched operation."
